

May 25, 2021

1

Page 1

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

DR. THOMAS HUBBARD, PhD.,)
Plaintiff,)

VS.) CA NO. 1:20-CV-00767-R

SARAH ALLEN BLAKEMORE;)
AND JOHN DOES 1-10,)
Defendants.)

ORAL AND VIDEOTAPED DEPOSITION OF

THOMAS HUBBARD

May 25, 2021

ORAL AND VIDEOTAPED DEPOSITION OF

THOMAS HUBBARD, produced as a witness at the instance of
the Defendants, and duly sworn, was taken in the
above-styled and numbered cause on the 25th of
May, 2021, from 10:05 a.m. to 12:36 p.m., before
JAZZMEN CANALES, CSR, in and for the State of Texas,
reported by machine shorthand at Wright & Greenhill PC,
900 Congress Avenue, Suite 500, Austin, Texas 78701,
Pursuant to the Texas Rules of Civil Procedure and the
provisions attached hereto.

EXHIBIT 3

May 25, 2021

2 to 5

<p style="text-align: right;">Page 2</p> <p style="text-align: center;">A P P E A R A N C E S</p> <p>1</p> <p>2</p> <p>3 FOR THE PLAINTIFF:</p> <p>4 MR. JOSEPH D. SIBLEY</p> <p>5 Camara & Sibley, LLP</p> <p>6 1108 Lavaca Street</p> <p>7 Suite 110263</p> <p>8 Austin, Texas 78701</p> <p>9 (713) 966-6789</p> <p>10 E-mail: sibley@camarasibley.com</p> <p>11 FOR THE DEFENDANTS:</p> <p>12 MR. BRANTLEY R. PRINGLE, JR.</p> <p>13 WRIGHT & GREENHILL, P.C.</p> <p>14 900 Congress Avenue</p> <p>15 Suite 500</p> <p>16 Austin, Texas 78701</p> <p>17 (512) 476-4600</p> <p>18 E-mail: rpringle@w-g.com</p> <p>19 ALSO PRESENT:</p> <p>20 SAM SWAIN, VIDEOGRAPHER</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 4</p> <p>1 THE VIDEOGRAPHER: We are on the record.</p> <p>2 May 25th, 2021. The time is 10:05 a.m. This begins</p> <p>3 Videotape No. 1. Will the court reporter please swear</p> <p>4 in the witness.</p> <p>5 THE COURT REPORTER: Actually, before I</p> <p>6 swear in the witness, I just need on the record if we</p> <p>7 are waiving the federal read-on.</p> <p>8 MR. PRINGLE JR.: I will waive the federal</p> <p>9 read-on.</p> <p>10 MR. SIBLEY: Yeah, we will waive.</p> <p>11 (Rule 309(b)(5) waived.)</p> <p>12 (Witness sworn.)</p> <p>13 MR. PRINGLE JR.: Before we proceed,</p> <p>14 Mr. Sibley and I have reached an agreement, as to my</p> <p>15 understanding, that we are going to conduct this</p> <p>16 deposition under the Texas rules of civil procedure. In</p> <p>17 other words, without speaking objections and reserving</p> <p>18 objections other than as to form for later.</p> <p>19 MR. SIBLEY: Correct. We will conduct</p> <p>20 under the state rules. As to objections, all objections</p> <p>21 will be objection, form, and no speaking objections.</p> <p>22 MR. PRINGLE JR.: Perfect.</p> <p>23 THOMAS HUBBARD,</p> <p>24 having been first duly sworn, testified as follows:</p> <p>25</p>
<p style="text-align: right;">Page 3</p> <p style="text-align: center;">I N D E X</p> <p>1</p> <p>2</p> <p>3</p> <p>4</p> <p>5</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 5</p> <p style="text-align: center;">E X A M I N A T I O N</p> <p>1</p> <p>2 BY MR. PRINGLE JR.:</p> <p>3 Q. Please state your name, sir.</p> <p>4 A. Thomas King Hubbard.</p> <p>5 Q. And what is your date of birth?</p> <p>6 A. July 19th, 1956.</p> <p>7 Q. And what is your current address?</p> <p>8 A. 791 Victoria Park Drive, Chico, California</p> <p>9 95926.</p> <p>10 Q. And then how long have you lived at that</p> <p>11 address?</p> <p>12 A. Since about July of 2017 that has been my</p> <p>13 formal residence.</p> <p>14 Q. All right. And do you reside alone there?</p> <p>15 A. Currently, yes.</p> <p>16 Q. We are here to take your deposition today in a</p> <p>17 defamation lawsuit you have filed in federal court. I</p> <p>18 assume you are familiar with that?</p> <p>19 A. Yes.</p> <p>20 Q. Since the -- since the filing of the lawsuit,</p> <p>21 have you lived with anyone?</p> <p>22 THE WITNESS: We filed in, I think it was,</p> <p>23 September of last year, is that right, Joe?</p> <p>24 MR. SIBLEY: I can't answer the questions</p> <p>25 for you.</p>

May 25, 2021

6 to 9

<p style="text-align: right;">Page 6</p> <p>1 THE WITNESS: Okay.</p> <p>2 A. Has anyone been living there since then? No.</p> <p>3 I mean, not for any period more than about two weeks.</p> <p>4 Q. (BY MR. PRINGLE JR.) All right. Has anyone</p> <p>5 lived there since -- with you for more than a period of</p> <p>6 two weeks since, say, January of 2020?</p> <p>7 A. No.</p> <p>8 Q. And this is a home, I presume, that you own?</p> <p>9 A. Yes.</p> <p>10 Q. And you also have an address in Austin?</p> <p>11 A. No longer. I do own a property in Austin, but</p> <p>12 that is rented out.</p> <p>13 Q. And back in the end of 2019, were you residing</p> <p>14 at that address?</p> <p>15 A. Yes, I was. Well, if you are talking about</p> <p>16 December 31st of 2019, no. But up until the incident</p> <p>17 where my house was assaulted by a violent mob, I was</p> <p>18 living there for the fall semester while I was teaching</p> <p>19 at U.T.</p> <p>20 Q. All right. And how long have you lived at the</p> <p>21 Austin address before you departed, say, in early</p> <p>22 December 2019?</p> <p>23 A. I came back there in late August at the</p> <p>24 beginning of the semester, and I also resided there</p> <p>25 during fall semester of 2018. During the spring, I was</p>	<p style="text-align: right;">Page 8</p> <p>1 Q. All right. And if you answer a question</p> <p>2 without asking for clarification, may I presume that you</p> <p>3 understood it at the time?</p> <p>4 A. Yes.</p> <p>5 Q. And so far you are doing a very good job of</p> <p>6 patiently waiting until the end of my question before</p> <p>7 you start your response, which is good for our court</p> <p>8 reporter so she can take down a full question and a full</p> <p>9 response. Okay?</p> <p>10 A. Yes.</p> <p>11 Q. All right. If at any time I cut you off and</p> <p>12 you are not done talking, you let me know, and I will be</p> <p>13 quiet until you are. Okay?</p> <p>14 A. Thank you.</p> <p>15 Q. All right. And by the same token, if you will</p> <p>16 continue to let me get to the end of my question so I</p> <p>17 don't have to repeat it, that would be much appreciated</p> <p>18 as well.</p> <p>19 A. Yes, of course.</p> <p>20 Q. All right. And finally, you are doing a good</p> <p>21 job of answering with words as opposed to merely</p> <p>22 gestures or guttural utterances like uh-huh and huh-uh,</p> <p>23 which need to be avoided. Okay?</p> <p>24 A. Yes. As a professor, I am experienced using</p> <p>25 words.</p>
<p style="text-align: right;">Page 7</p> <p>1 on leave and back in California.</p> <p>2 Q. I see. Have you ever given a deposition</p> <p>3 before?</p> <p>4 A. No.</p> <p>5 Q. Have you ever testified in court?</p> <p>6 A. Only in small claims cases.</p> <p>7 Q. I assume that you had a chance to meet with</p> <p>8 Mr. Sibley and has explained to you what a deposition</p> <p>9 is. So let me say that, first off, in examining you</p> <p>10 today I am not interested in anything that Mr. Sibley</p> <p>11 has told you or that you have told him. You understand</p> <p>12 that?</p> <p>13 A. Of course.</p> <p>14 Q. You understand that's privileged?</p> <p>15 A. Yes, of course.</p> <p>16 Q. All right. You understand that you are giving</p> <p>17 sworn testimony subject to pains and penalty of perjury?</p> <p>18 A. Yes.</p> <p>19 Q. And you understand that because you are giving</p> <p>20 sworn testimony, it is important that you understand all</p> <p>21 my questions?</p> <p>22 A. Yes.</p> <p>23 Q. And if I ever ask you a question that is</p> <p>24 unclear to you, will you tell me that it is unclear?</p> <p>25 A. Yes, certainly.</p>	<p style="text-align: right;">Page 9</p> <p>1 Q. Good. You are going to use a lot of them</p> <p>2 today.</p> <p>3 A. Probably.</p> <p>4 Q. What did you do to prepare for your deposition?</p> <p>5 A. I reviewed some of the legal documents that</p> <p>6 have been filed.</p> <p>7 Q. By legal documents, what are you referring to?</p> <p>8 A. Our original filing, your motion for summary</p> <p>9 judgment, our response to that motion, a couple of the</p> <p>10 exhibits to the various filings.</p> <p>11 Q. Anything else?</p> <p>12 A. I did review a portion of one of my articles.</p> <p>13 Q. Anything else?</p> <p>14 A. Not that I can think of.</p> <p>15 Q. All right. Did you review any of the discovery</p> <p>16 responses?</p> <p>17 A. Yes. I believe those were among the documents</p> <p>18 that I reviewed.</p> <p>19 Q. And you reviewed a portion of one of your</p> <p>20 articles?</p> <p>21 A. Yes.</p> <p>22 Q. Which article did you review a portion of?</p> <p>23 A. The one that was published in the Thymos in</p> <p>24 2010.</p> <p>25 Q. And the name of that article is that?</p>

May 25, 2021

10 to 13

<p style="text-align: right;">Page 10</p> <p>1 A. Sexual Consent and the Adolescent Male, or What</p> <p>2 Can We Learn from the Ancient Greeks.</p> <p>3 Q. And why did you review that article?</p> <p>4 A. Because one of the statements in the</p> <p>5 Defendant's defamatory flyer quoted three words from</p> <p>6 that article, and I wanted to review the context of</p> <p>7 those three words.</p> <p>8 Q. And which were the three words that were</p> <p>9 quoted?</p> <p>10 A. Proper learning experience.</p> <p>11 Q. And were those three words quoted accurately?</p> <p>12 A. I did put those three words together, but they</p> <p>13 of course came within a much more complicated context.</p> <p>14 Q. We may talk about that later. Any other</p> <p>15 documents that you recall reviewing?</p> <p>16 A. Not in the immediate period before this</p> <p>17 deposition.</p> <p>18 Q. All right. Other than meetings with</p> <p>19 Mr. Sibley, have you had conversations with anyone about</p> <p>20 your deposition?</p> <p>21 A. Only to let them know that I was doing a</p> <p>22 deposition, but not conversations that went into any</p> <p>23 detail about the issues involved.</p> <p>24 Q. And who would you have told that you were</p> <p>25 giving a deposition?</p>	<p style="text-align: right;">Page 12</p> <p>1 A. Romantic, but not sexually.</p> <p>2 Q. All right. And how old is Mr. Wells?</p> <p>3 A. 22.</p> <p>4 Q. And was he a student of yours?</p> <p>5 A. No.</p> <p>6 Q. Okay. Have you ever taught him anything?</p> <p>7 A. No.</p> <p>8 Q. And how did you and Mr. Wells meet?</p> <p>9 A. Through an online gay meeting site.</p> <p>10 Q. Okay. And what was the name of it?</p> <p>11 A. I think seekingarrangement.com.</p> <p>12 Q. Is it a -- is it a members only site?</p> <p>13 A. You have to pay to be a member of it.</p> <p>14 Q. All right. And so absent the payment, and the</p> <p>15 membership access is restricted?</p> <p>16 A. Yes.</p> <p>17 Q. Are a member of any other similar sites?</p> <p>18 A. No, and even my membership there lapsed years</p> <p>19 ago.</p> <p>20 Q. All right. Anybody else that you discussed</p> <p>21 your deposition with besides Mr. Wells?</p> <p>22 A. Avi Eindorot.</p> <p>23 Q. And can you spell that? Avi I got.</p> <p>24 A. Eindorot is E-I-N-D-O-R-O-T.</p> <p>25 Q. D-O --</p>
<p style="text-align: right;">Page 11</p> <p>1 A. My current partner who is traveling with me.</p> <p>2 Q. And what is his or her name?</p> <p>3 A. Elijah Wells.</p> <p>4 Q. And this is -- are y'all married?</p> <p>5 A. No.</p> <p>6 Q. What does Mr. Wells do?</p> <p>7 A. He was a student at a local community college,</p> <p>8 and he is about to take on a job working at a local</p> <p>9 tavern once we get back from our trip.</p> <p>10 Q. And what community college was Mr. Wells a</p> <p>11 student in?</p> <p>12 A. Sacramento City College.</p> <p>13 Q. Is that in Chico?</p> <p>14 A. No. It is in Sacramento, but given that all</p> <p>15 classes were online, he did not attend classes in</p> <p>16 person, so he could do that remotely.</p> <p>17 Q. All right. And how long have you and Mr. Wells</p> <p>18 been together?</p> <p>19 A. I think since 2018, and then we had a period of</p> <p>20 rupture and didn't see each other at all for over a</p> <p>21 year. And then earlier this year we were both tired of</p> <p>22 being isolated due to COVID, so we rekindled our</p> <p>23 friendship.</p> <p>24 Q. Okay. And am I correct that it's a romantic</p> <p>25 friendship?</p>	<p style="text-align: right;">Page 13</p> <p>1 A. R-O-T.</p> <p>2 Q. And who is Avi Eindorot?</p> <p>3 A. He is the vice president of the William A.</p> <p>4 Percy Foundation.</p> <p>5 Q. And what were the nature of your conversations</p> <p>6 with Mr. Eindorot?</p> <p>7 A. He had concerns about the foundation being</p> <p>8 drawn into this.</p> <p>9 Q. And what were those concerns?</p> <p>10 A. The privacy of the directors and donors and</p> <p>11 grantees.</p> <p>12 Q. Anything else?</p> <p>13 A. That was essentially it.</p> <p>14 Q. And you mentioned the William A. Percy</p> <p>15 Foundation. Is that a 501(c)(3)?</p> <p>16 A. Yes.</p> <p>17 Q. And it makes, I guess, reports and filings with</p> <p>18 the -- with the appropriate authorities as a 501(c)(3)?</p> <p>19 A. Yes, we do.</p> <p>20 Q. What sorts of things does the William A. Percy</p> <p>21 Foundation disclose as part of its public filings?</p> <p>22 A. Our tax records are public. We do filings with</p> <p>23 the California State authorities, we file with the</p> <p>24 Secretary of State in Delaware where we are</p> <p>25 incorporated, and those filings would consist of naming</p>

May 25, 2021

14 to 17

<p style="text-align: right;">Page 14</p> <p>1 our directors and relative basic information like that.</p> <p>2 Q. Understood. Who are the directors of the</p> <p>3 William A. Percy Foundation?</p> <p>4 A. Myself, Avi Eindorot, James Dubro,</p> <p>5 Thomas Waugh, and Beert Viscrat. There are five of us.</p> <p>6 Q. Okay. Avi, you have spelled his name. You we</p> <p>7 have got. What is James' last name?</p> <p>8 A. Dubro, that's D-U-B-R-O.</p> <p>9 Q. All right. And Thomas Waugh?</p> <p>10 A. Yeah, W-A-U-G-H. It is like Evelyn Waugh.</p> <p>11 Q. Understood. And Beert, what's Beert's last</p> <p>12 name?</p> <p>13 A. Verstraete, V-E-R-S-T-R-A-E-T-E.</p> <p>14 Q. All right.</p> <p>15 A. And it is Beert spelled with two Es.</p> <p>16 Q. One in the --</p> <p>17 A. It is a Dutch name.</p> <p>18 Q. One in the middle, one on the end?</p> <p>19 A. No, no, no. It is like beer, plus T.</p> <p>20 Q. Oh, I gotcha.</p> <p>21 A. It is the Dutch spelling.</p> <p>22 Q. And Avi, he is the vice president of the</p> <p>23 William A. Percy Foundation. Does Avi have any other</p> <p>24 employment besides that?</p> <p>25 A. He is a freelance journalist.</p>	<p style="text-align: right;">Page 16</p> <p>1 different Concordia.</p> <p>2 Q. And where is that Concordia where Professor</p> <p>3 Waugh was?</p> <p>4 A. Montreal</p> <p>5 Q. And Beert with two Es. Is he also a professor?</p> <p>6 A. He is a retired professor.</p> <p>7 Q. All right. And where did Professor Verstraete</p> <p>8 profess?</p> <p>9 A. Acadia University.</p> <p>10 Q. In Nova Scotia?</p> <p>11 A. Yes, indeed.</p> <p>12 Q. And how long has he been retired?</p> <p>13 A. Again, I think probably about five years.</p> <p>14 Although, I think he did do some part-time teaching even</p> <p>15 after his formal retirement, but I think now he does not</p> <p>16 teach at all.</p> <p>17 Q. And what were his subjects of expertise when he</p> <p>18 was teaching at Acadia?</p> <p>19 A. History and classics.</p> <p>20 Q. And how long have the five of you been the</p> <p>21 board at the William A. Percy Foundation?</p> <p>22 A. Thomas Waugh is the most recent member of the</p> <p>23 board, and I think he joined us last fall.</p> <p>24 Q. Other than your -- well, let me ask you this.</p> <p>25 Your work with the William A. Percy Foundation, are you</p>
<p style="text-align: right;">Page 15</p> <p>1 Q. All right. Is he also the IT director at</p> <p>2 William A. Percy.</p> <p>3 A. Well, we call it webmaster.</p> <p>4 Q. Okay. And he performs that task?</p> <p>5 A. Yes.</p> <p>6 Q. And James Dubro, is -- what's his side job?</p> <p>7 A. He is retired.</p> <p>8 Q. Before he was retired, what was his job?</p> <p>9 A. He was a crime reporter with the Canadian</p> <p>10 Broadcasting Corporation, and there is other news --</p> <p>11 Canadian news outlets.</p> <p>12 Q. Where was he based in Canada?</p> <p>13 A. Toronto.</p> <p>14 Q. And how long has he been retired?</p> <p>15 A. I am not sure exactly, but I think he has been</p> <p>16 retired since I knew him, which is approximately the</p> <p>17 last five years. He is in his 70s.</p> <p>18 Q. All right. And Thomas Waugh, is he -- what's</p> <p>19 his -- does he have another job?</p> <p>20 A. He is retired.</p> <p>21 Q. And what was his prior job before retirement?</p> <p>22 A. He was a professor of cinema and media studies</p> <p>23 at Concordia University.</p> <p>24 Q. Here in Austin?</p> <p>25 A. No, no, no, not our Concordia, it is a</p>	<p style="text-align: right;">Page 17</p> <p>1 paid for that?</p> <p>2 A. No.</p> <p>3 Q. Are you -- you continue to be a member of the</p> <p>4 University of Texas faculty?</p> <p>5 A. Yes.</p> <p>6 Q. And you -- I think I saw something about your</p> <p>7 salary. What is your salary at U.T.?</p> <p>8 A. Around 107,000. For the last several years I</p> <p>9 have told them that I don't need any raises. I feel</p> <p>10 that what money is available should go to younger</p> <p>11 faculty who would benefit from it more, and, you know, I</p> <p>12 don't really need the money.</p> <p>13 MR. PRINGLE JR.: Objection.</p> <p>14 Nonresponsive.</p> <p>15 Q. (BY MR. PRINGLE JR.) What other sources of</p> <p>16 income do you have besides your income at U.T.?</p> <p>17 A. I own a number of rental real estate</p> <p>18 properties.</p> <p>19 Q. Here in Austin?</p> <p>20 A. Only the one residence in Austin where I used</p> <p>21 to live. Most of them -- I mean, the others are all in</p> <p>22 Chico.</p> <p>23 Q. Any other income besides your rental properties</p> <p>24 and your U.T. income?</p> <p>25 A. Royalties from some of my books.</p>

May 25, 2021

18 to 21

<p style="text-align: right;">Page 18</p> <p>1 Q. Anything else?</p> <p>2 A. Not other than tiny amounts of interest on bank</p> <p>3 accounts.</p> <p>4 Q. Okay. And generally, what do your royalties</p> <p>5 from your books run a year?</p> <p>6 A. Slightly over a thousand.</p> <p>7 Q. Tell me about your employment at U.T. When did</p> <p>8 you come to U.T.?</p> <p>9 A. 1985. And that was a one-year position. From</p> <p>10 1986 to 1988 I was at Cornell, and then I was brought</p> <p>11 back to U.T. in 1988 in a tenure-screen position, which</p> <p>12 I have held continuously since then.</p> <p>13 Q. Let's start -- let's start with where you grew</p> <p>14 up.</p> <p>15 A. Uh-huh.</p> <p>16 Q. You grew up in Oklahoma?</p> <p>17 A. Until the age of 4.</p> <p>18 Q. And then where?</p> <p>19 A. In the Bay Area of California. Originally, my</p> <p>20 family lived in San Mateo, after that in Walnut Creek.</p> <p>21 Both are suburbs of San Francisco.</p> <p>22 Q. And you graduated high school in the Bay Area?</p> <p>23 A. Yes, in Walnut Creek.</p> <p>24 Q. And that would have been probably 1974ish?</p> <p>25 A. '72.</p>	<p style="text-align: right;">Page 20</p> <p>1 certainly do read them.</p> <p>2 Q. And fluent in German?</p> <p>3 A. Relatively, and I have lived in Germany.</p> <p>4 Q. Okay. After 1977, did you continue your</p> <p>5 studies?</p> <p>6 A. Yes, at Yale University.</p> <p>7 Q. And at Yale University, when were you there?</p> <p>8 A. '77 to '80.</p> <p>9 Q. And what was your degree in?</p> <p>10 A. Classics.</p> <p>11 Q. And what -- what is your degree from Yale?</p> <p>12 A. Ph.D.</p> <p>13 Q. What was your dissertation?</p> <p>14 A. It was called Polar Structure in the Odes of</p> <p>15 Pindar. Pindar is a Greek poet.</p> <p>16 Q. 1980 until 1985 when you came to U.T., what did</p> <p>17 you do?</p> <p>18 A. I was a visiting assistant professor at Bard</p> <p>19 College in Ammandale-On-Hudson, New York from '80 to</p> <p>20 '81. From '81 until '82, I did not have employment. It</p> <p>21 was a very tight job market then. From '82 to '84, I</p> <p>22 was assistant professor at Skidmore College in Saratoga</p> <p>23 Springs, New York. And from '84 to '85, I was a</p> <p>24 visiting assistant professor at the University of</p> <p>25 Minnesota.</p>
<p style="text-align: right;">Page 19</p> <p>1 Q. And then what did you do?</p> <p>2 A. I then went to college at Santa Clara</p> <p>3 University where I graduated in 1975.</p> <p>4 Q. And your degree was in what?</p> <p>5 A. English.</p> <p>6 Q. After 1975, what was your next academic</p> <p>7 outpost?</p> <p>8 A. I was a graduate student at the University of</p> <p>9 California, Berkeley.</p> <p>10 Q. And what period of time were you at Berkeley?</p> <p>11 A. '75 to '77.</p> <p>12 Q. And did you receive a graduate degree from</p> <p>13 Berkeley?</p> <p>14 A. A master's degree.</p> <p>15 Q. And what's your master's degree in?</p> <p>16 A. Comparative literature.</p> <p>17 Q. What is that exactly?</p> <p>18 A. It is a study of literary text from multiple</p> <p>19 linguistic and national traditions, and the ones that I</p> <p>20 specialized in at that point were Greek, Latin, and</p> <p>21 German.</p> <p>22 Q. I assume you are fluent in Greek, Latin, and</p> <p>23 German?</p> <p>24 A. Yes. Although, I don't speak Latin or ancient</p> <p>25 Greek. There is really no point in that, but I</p>	<p style="text-align: right;">Page 21</p> <p>1 Q. You mentioned that you also lived in Germany.</p> <p>2 When did you live in Germany?</p> <p>3 A. I had a research grant from the Alexander von</p> <p>4 Humboldt Foundation, and I believe that was '96 to '97.</p> <p>5 It might have been '95 to '96.</p> <p>6 Q. All right.</p> <p>7 A. And then I had a resumption fellowship with</p> <p>8 them in the spring semester of 2003, so I was in Germany</p> <p>9 approximately a year and a half.</p> <p>10 Q. And at the University of Texas, you had been</p> <p>11 here continuously since 1988, correct?</p> <p>12 A. Correct.</p> <p>13 Q. What are your interests? What are your</p> <p>14 academic interests at the University of Texas?</p> <p>15 A. I was hired as a specialist in Greek poetry,</p> <p>16 and starting after I received tenure in 1993, I became</p> <p>17 increasingly interested in ancient Greek homosexuality.</p> <p>18 And I taught the first course on any gay theme that</p> <p>19 anyone at the University of Texas taught.</p> <p>20 Q. Say that again.</p> <p>21 A. I taught the first course on a gay-related</p> <p>22 theme --</p> <p>23 Q. Oh.</p> <p>24 A. -- that has ever been taught at the University</p> <p>25 of Texas starting around 1993.</p>

May 25, 2021

22 to 25

<p style="text-align: right;">Page 22</p> <p>1 Q. And am I correct then that none of your 2 academic endeavors were focused on ancient Greek 3 homosexuality or any homosexual themes before you 4 received tenure?</p> <p>5 A. That would be correct. Although, it comes up 6 as a theme ubiquitously in Greek poetry, which I had 7 certainly studied in the 13 years -- well, actually 8 counting my graduate work, the 18 years prior to that.</p> <p>9 Q. But prior to receiving tenure, you hadn't 10 written extensively on it or studied it --</p> <p>11 A. No at all.</p> <p>12 Q. -- exclusively, true?</p> <p>13 A. Not at all.</p> <p>14 Q. And what prompted you to turn your attention to 15 gay-related themes and homosexual studies in 1993?</p> <p>16 A. That I myself considered that I was gay, and, 17 you know, this was a way of making my academic training 18 relevant to that personal identity. I also had a sense 19 that gay students at the University were not being well 20 served with courses that were relevant to their 21 interest. And I perceived it as a need, and my 22 department was supportive of my teaching that course. 23 It was a completely new course that I devised.</p> <p>24 Q. Prior to you receiving tenure, did you consider 25 yourself to be gay?</p>	<p style="text-align: right;">Page 24</p> <p>1 day.</p> <p>2 Q. And I forget to ask you, but I assume I know 3 the answer to this, but let me make sure I am correct. 4 You've never married?</p> <p>5 A. No.</p> <p>6 Q. And you have no children?</p> <p>7 A. No.</p> <p>8 Q. Do you have any wards or minor children that 9 you have been responsible --</p> <p>10 A. No.</p> <p>11 Q. -- in your adult life?</p> <p>12 A. No.</p> <p>13 Q. Since January 2020 classes have you taken -- 14 have you taught?</p> <p>15 A. In spring of 2020, I was on sick leave. This 16 fall I taught classical mythology, and I taught the same 17 course this spring.</p> <p>18 Q. So no classes in spring of 2020?</p> <p>19 A. No.</p> <p>20 Q. And classical mythology, what is that class?</p> <p>21 A. It is surveys the major myths that we have 22 attested from ancient Greece and Rome. We talk about 23 the cults of the various Greco Roman gods. We talk 24 about the hero legends of Hercules and Perseus and, 25 you know, other well-known figures. I mean, many of</p>
<p style="text-align: right;">Page 23</p> <p>1 A. Yes.</p> <p>2 Q. Have you always considered yourself to be gay?</p> <p>3 A. Certainly since puberty.</p> <p>4 Q. All right.</p> <p>5 A. But I would say that nowadays I regard sexual 6 orientation as a much more fluid and complicated set of 7 desires and perceptions. I mean, part of my studying 8 and becoming learned in this subject was to see a lot of 9 complexities that as a younger man I did not yet 10 perceive. And of course society's perception of sexual 11 orientation has changed. I think today there is a much 12 greater recognition that sexual identities are very 13 complicated and fluid and evolving things.</p> <p>14 Q. Other interests that you had at the University 15 of Texas besides Greek poetry and homosexual studies?</p> <p>16 A. I have taught widely in Greek and Latin 17 literature that includes prose authors, taught quite a 18 few courses in Latin as well.</p> <p>19 Q. And you --</p> <p>20 A. I mean, we are broadly trained as classicists. 21 We have to pass comprehensive exams in both Greek and 22 Latin, and flexibility is something that is desired. I 23 would also say that I have always been very interested 24 in what we call classical reception, which is the study 25 of the classical tradition in later periods up to modern</p>	<p style="text-align: right;">Page 25</p> <p>1 whom students have heard about in their earlier life. 2 We also talk about literary works that involve 3 mythologies such as Homer's Iliad and various Greek 4 tragedies.</p> <p>5 Q. It is a survey course?</p> <p>6 A. At least the way I teach it, yes. It is a 7 survey of the corpus of Greek mythology.</p> <p>8 Q. It is an introductory course?</p> <p>9 A. Yes. It is a freshman-level course.</p> <p>10 Q. All right. And what's the enrollment of 11 classical mythology, say, in the fall of 2020?</p> <p>12 A. We teach several sections -- I mean, the 13 department teaches several sections of it.</p> <p>14 Q. In your section.</p> <p>15 A. My section was a fairly small section of around 16 40 students, both fall and spring. It was thought best 17 that I teach a small section because of student 18 anxieties in light of the defamatory statements of the 19 Defendant. There was concern that I shared about 20 students learn -- going online to look up whether I am a 21 good professor or not and then finding this garbage. 22 Whenever you google my name, it is the -- in fact, the 23 first video that comes up is a video of the attack of my 24 house and, you know, various articles in Austin 25 Statesman and Dallas Morning News, until we got it taken</p>

May 25, 2021

26 to 29

<p style="text-align: right;">Page 26</p> <p>1 down, Law Enforcement Today. And it was very 2 distressing to students to hear that their professor is 3 an advocate of pedophilia. And in the fall I even had 4 one student's mother send me an angry e-mail demanding 5 to know about this and then complaining to the president 6 of the University. I mean, this is very distracting to 7 students, and, you know, it causes them not to trust 8 their teacher, and that interferes with their academic 9 performance.</p> <p>10 There was one student in the fall 2019 11 course that was so distressed by the flyer that the 12 Defendant passed out that she went to the Dean of 13 Students office and asked to be allowed not to attend 14 the class anymore. And as a result of not attending the 15 class, she of course missed everything that I introduced 16 in the last two or three weeks and did very poorly on 17 the final examination, which concentrated on that 18 material at the end of the course. And whereas she was 19 at least at a C level prior to that, in virtue of her 20 poor performance on the file, she received a D in the 21 course.</p> <p>22 So the Defendant's actions have not only 23 affected me and my reputation, they have affected and 24 distressed my students, and they have interfered with 25 the pedagogical mission of the University.</p>	<p style="text-align: right;">Page 28</p> <p>1 Q. How do you spell that? 2 A. G-U-L-I-Z-I-O. 3 Q. Okay. Gulizio. Who else? 4 A. I think there were a couple of graduate 5 students who were also involved. My understanding was 6 that because of the COVID shutdown of the University 7 that the other sections were entirely online. And my 8 section also used a lot of online materials, but it 9 included synchronous lectures by me, which we did via 10 Zoom. 11 Q. The class that you taught last year -- last 12 semester, I should say, in fall of 2020, mythology -- 13 no, classical mythology, was it all virtual? 14 A. There were no in-person meetings. The 15 University's policy was that the majority of classes 16 would be online and only a few relatively small classes 17 in person. 18 Q. And is that a typical course load for you, 19 teaching one intro-level course. 20 A. No. I mean, our usual course load is two 21 courses per semester. 22 Q. And why did you not teach any other courses 23 last semester? 24 A. I have what is called modified instructional 25 status because they wanted me to design a new online</p>
<p style="text-align: right;">Page 27</p> <p>1 MR. PRINGLE JR.: Objection. 2 Nonresponsive. 3 Q. (BY MR. PRINGLE JR.) Do you remember my 4 question? What question were you answering? 5 A. Your question had to do with the -- the 6 teaching of the mythology course. 7 Q. It was a simple question. How many students 8 are in your section? 9 A. No, I think that was the starting point, yes, 10 and I told you around 40. 11 Q. Yeah. 12 A. And I was explaining why it was a smaller 13 section whereas usually it is a large section course 14 with over a hundred in each section. 15 Q. And I appreciate that, but that's not really 16 what I asked. 17 A. Okay. I understand. 18 Q. Okay. How many sections were taught of 19 classical mythology last fall? 20 A. Three or four. 21 Q. Who else taught it besides you? 22 A. Joann Gulizio who is a lecturer in the 23 department. 24 Q. Joann Gulizio? 25 A. Uh-huh.</p>	<p style="text-align: right;">Page 29</p> <p>1 version of CC301, which is our introduction to ancient 2 Greeks. 3 Q. And what classes are you teaching this 4 semester? 5 A. Well, the spring semester is finished. 6 Q. Okay. Fair enough. What classes did you teach 7 the spring semester that just finished? 8 A. Classical mythology. 9 Q. All right. Same deal? 10 A. One -- one small section. 11 Q. One small section, 40 students, all virtual? 12 A. Yes. 13 Q. Okay. And you continued to work on developing 14 what now for the University? 15 A. A new online version of a different class that 16 is also usually a large lecture course. Our department 17 is trying to develop more online classes to give those 18 students who prefer that mode of instruction, the 19 opportunity to learn that way and take the course from 20 home. 21 Q. Kind of like University of Phoenix? 22 A. Uh-huh. Yes. That's right. That's right. It 23 is something that a lot of universities are doing right 24 now. 25 Q. Who is your current teaching assistant?</p>

May 25, 2021

30 to 33

<p style="text-align: right;">Page 30</p> <p>1 A. I don't have one. Teaching assistants are only</p> <p>2 assigned to large sections.</p> <p>3 Q. When is the last time you had a teaching</p> <p>4 assistant?</p> <p>5 A. In the fall of 2019.</p> <p>6 Q. And who was your teaching assistant in the fall</p> <p>7 of 2019?</p> <p>8 A. There were two of them, John Anderson and Alain</p> <p>9 Zaramian.</p> <p>10 Q. John Anderson, I think I can get that one.</p> <p>11 What was the second one?</p> <p>12 A. Alain, A-L-A-I-N. Zaramian, Z-A-R-A-M-I-A-N.</p> <p>13 Q. And these are graduate students in classics?</p> <p>14 A. Yes.</p> <p>15 Q. And where are they now?</p> <p>16 A. They are still in the graduate program.</p> <p>17 Although, Alain is finishing his degree this summer.</p> <p>18 Q. And you have not had any teaching assistants</p> <p>19 since the publication of the flyer in November of 2019;</p> <p>20 is that true?</p> <p>21 A. Well, I continued to have the teaching</p> <p>22 assistants in December of 2019, but not since then</p> <p>23 because I don't even teach in small courses.</p> <p>24 Q. At the University, who do you supervise?</p> <p>25 A. I have three doctoral students completing their</p>	<p style="text-align: right;">Page 32</p> <p>1 that was directly concerned with that.</p> <p>2 Q. An undergraduate thesis?</p> <p>3 A. Yes, an -- yeah, an undergraduate honors</p> <p>4 thesis.</p> <p>5 Q. All right. We will get to that. Any other</p> <p>6 graduate thesis that you have supervised on Greek</p> <p>7 sexuality.</p> <p>8 A. No, I don't believe so. I mean, we used to</p> <p>9 have masters thesis, but I think those that I supervised</p> <p>10 were all on different topics.</p> <p>11 Q. And have you ever supervised either a doctoral</p> <p>12 or a graduate super -- let me start over. Have you ever</p> <p>13 supervised a graduate or doctoral thesis on any sort of</p> <p>14 homosexual studies?</p> <p>15 A. No.</p> <p>16 Q. Other than your students -- well, talk to me</p> <p>17 about that the senior thesis that you supervised on</p> <p>18 Greek sexuality.</p> <p>19 A. Uh-huh.</p> <p>20 Q. Tell me about that.</p> <p>21 A. The student's name was Brian Brennan, and he</p> <p>22 went on to do a master's degree at the University of</p> <p>23 Wisconsin. He was originally planning to be a computer</p> <p>24 science major, but during his freshman year he took a</p> <p>25 freshman signature course with me on sexuality politics</p>
<p style="text-align: right;">Page 31</p> <p>1 dissertations under my supervision, Alain Zaramian is</p> <p>2 one of them. Do you want the names of the others?</p> <p>3 Q. Sure.</p> <p>4 A. Michael Mignanelli and Becky Kahane.</p> <p>5 Q. And how do you spell Michael's last name?</p> <p>6 A. M-I-G-N-A-N-E-L-L-I.</p> <p>7 Q. And Becky?</p> <p>8 A. K-A-H-A-N-E.</p> <p>9 Q. Also classic students?</p> <p>10 A. Yes, all three of them.</p> <p>11 Q. And when is -- when is their doctorate</p> <p>12 expected?</p> <p>13 A. Alain will defend this summer. Becky will</p> <p>14 defend in the next fall semester. Michael, I am not so</p> <p>15 sure about. His progress has been -- I mean, he started</p> <p>16 later than the others, and his progress has not been as</p> <p>17 rapid.</p> <p>18 Q. Are any of the doctoral student's thesis on</p> <p>19 subjects of Greek sexuality?</p> <p>20 A. No.</p> <p>21 Q. Have you supervised any doctoral students on</p> <p>22 writing thesis or a thesis on Greek sexuality.</p> <p>23 A. Not at the doctoral level.</p> <p>24 Q. On any other level?</p> <p>25 A. There was a senior thesis that I supervised</p>	<p style="text-align: right;">Page 33</p> <p>1 and human rights and was so fascinated by the material,</p> <p>2 which did include a bit of Greek material, that he</p> <p>3 decided to take ancient Greek and liked it and decide to</p> <p>4 become a classics major instead of a computer scientist.</p> <p>5 Q. And what was his senior thesis on Greek</p> <p>6 sexuality as you recall?</p> <p>7 A. I don't recall the exact title, but it did have</p> <p>8 to do with, you know, Greek pederasty, which is the</p> <p>9 predominant form of Greek homosexuality, although not</p> <p>10 the only form.</p> <p>11 Q. Say that again.</p> <p>12 A. It is the predominant form, but not the only</p> <p>13 form of Greek homosexuality.</p> <p>14 Q. Pederasty?</p> <p>15 A. And I should -- I should -- yes. I should</p> <p>16 revise my previous statement. There was also another</p> <p>17 senior honors thesis in addition to Brian's written by</p> <p>18 Kathleen Kitter. And although it was not directly on</p> <p>19 sexuality per say, it dealt with some poems of</p> <p>20 theocratist that were pederastic in nature.</p> <p>21 Q. Does -- at U.T., have you ever served as an</p> <p>22 academic advisor?</p> <p>23 A. No.</p> <p>24 Q. Why not?</p> <p>25 A. Our department is a very factualized and</p>

May 25, 2021

34 to 37

<p style="text-align: right;">Page 34</p> <p>1 disfunctional department, which has -- used to be one of</p> <p>2 the top ten graduate programs in the nation, used to be</p> <p>3 the largest classics department in the United States</p> <p>4 with 25 faculty lines. Next year we will be down to 12</p> <p>5 faculty lines.</p> <p>6 Q. What is a faculty line?</p> <p>7 A. A tenure stream. In other words, tenure track</p> <p>8 or tenured, an actual professorial line as opposed to a</p> <p>9 lectureship.</p> <p>10 Q. Understood. So at the time you came to the</p> <p>11 department in 1988, there were 25 professorial lines?</p> <p>12 A. No. I think at that time they were 18, and</p> <p>13 eventually we gained new positions and built up to 25.</p> <p>14 So 25 would be what we would have had around 2000.</p> <p>15 Q. All right. And then since 2000, your</p> <p>16 professional lines have been reduced to half?</p> <p>17 A. Yes, approximately.</p> <p>18 Q. And mechanically, how was that done?</p> <p>19 A. Every time someone leaves, whether it due to</p> <p>20 retirement or a job offer at another institution, the</p> <p>21 position goes back to the University to reallocate as</p> <p>22 they see fit. And at least two of the former deans of</p> <p>23 our college felt that the department was so badly</p> <p>24 dysfunctional they felt it did not deserve to have those</p> <p>25 lines renewed, and they instead reassigned them to</p>	<p style="text-align: right;">Page 36</p> <p>1 the classics department at U.T.?</p> <p>2 A. Oh, yes. People in the hegemonic faction try</p> <p>3 to blame it on me.</p> <p>4 Q. What does hegemonic mean?</p> <p>5 A. The leadership faction.</p> <p>6 Q. Okay. So the leaders have tried to blame you</p> <p>7 for it? What have they said?</p> <p>8 A. They have accused me of being disruptive, by</p> <p>9 which they mean that I am very critical of their</p> <p>10 leadership and policies. I mean, in addition to their</p> <p>11 refusing that endowment, there have been several cases</p> <p>12 where productive colleagues had outside job offers, and</p> <p>13 they refused to match the offers. And, again, I was in</p> <p>14 favor of doing so. I mean, in the words of one of my</p> <p>15 colleagues, the former department chair of Karl Galinsky</p> <p>16 who was chair for 16 years and was largely responsible</p> <p>17 for building up the department, they were using their</p> <p>18 allegation against me as a smokescreen to cover up their</p> <p>19 own deficiencies as leaders.</p> <p>20 Q. We are going to mark some exhibits here today.</p> <p>21 A. Uh-huh.</p> <p>22 (Exhibit 1 marked.)</p> <p>23 Q. (BY MR. PRINGLE JR.) I am handing you what is</p> <p>24 marked as Exhibit 1, and ask if you have seen this</p> <p>25 before. You may take a moment to look at it.</p>
<p style="text-align: right;">Page 35</p> <p>1 better functioning departments. And among other things,</p> <p>2 our department refused a \$5 million in down share. And,</p> <p>3 you know, there was prospect that the same donors would</p> <p>4 give the University tons of millions of dollars. So I</p> <p>5 think that really angered the dean at the time. And as</p> <p>6 a result of our refuse -- I mean, I was very much in</p> <p>7 favor of our accepting that endowment, as were several</p> <p>8 of my colleagues, but we were, at the end of the day, a</p> <p>9 minority. It was an endowed share in biblical Greek,</p> <p>10 and, you know, some of my colleges are very strongly</p> <p>11 antireligious or at least antichristian, and they did</p> <p>12 not want to see development in that direction.</p> <p>13 Q. Do you take any responsibility for the</p> <p>14 disfunction in the department?</p> <p>15 A. No, because I have not been in a leadership</p> <p>16 position in the department. The responsibility for the</p> <p>17 dysfunction is with the people that have been leading</p> <p>18 the department.</p> <p>19 Q. You think dysfunction is created at the top of</p> <p>20 the department?</p> <p>21 A. Yes.</p> <p>22 Q. So you take no responsibility?</p> <p>23 A. No. I mean I have warned against the</p> <p>24 consequences of decisions like refusing that endowment.</p> <p>25 Q. Has anyone ever faulted you for dysfunction in</p>	<p style="text-align: right;">Page 37</p> <p>1 A. Yes. I have seen this before.</p> <p>2 Q. Is this indicative of the criticisms of you --</p> <p>3 A. Very -- very much so.</p> <p>4 Q. I wasn't finished.</p> <p>5 A. Sorry. Sorry.</p> <p>6 Q. Is this indicative of the criticisms of you</p> <p>7 being a seriously disruptive and destructive force in</p> <p>8 the classics department in the University?</p> <p>9 MR. SIBLEY: Objection. Form.</p> <p>10 A. Yes, this is -- this is the kind of</p> <p>11 argumentation they used.</p> <p>12 Q. (BY MR. PRINGLE JR.) All right. And how did</p> <p>13 you come to see Exhibit 1 before?</p> <p>14 A. Through an open records request.</p> <p>15 Q. All right. And is Exhibit 1 indicative of some</p> <p>16 of the complaints that were made about you by others in</p> <p>17 the department?</p> <p>18 A. Yes.</p> <p>19 Q. Okay. Is it indicative of your reputation in</p> <p>20 the department?</p> <p>21 A. My reputation among some members of the</p> <p>22 department.</p> <p>23 Q. All right.</p> <p>24 A. But I also had allies.</p> <p>25 Q. You also had what?</p>

May 25, 2021

38 to 41

<p style="text-align: right;">Page 38</p> <p>1 A. Allies.</p> <p>2 Q. Allies?</p> <p>3 A. Who saw this for what it was.</p> <p>4 Q. But certainly you would agree that your</p> <p>5 reputation in the department of classics, it was</p> <p>6 somewhat controversial over the years?</p> <p>7 MR. SIBLEY: Objection. Form.</p> <p>8 A. Inasmuch as I have been highly critical of the</p> <p>9 department's leadership, they presented that, and</p> <p>10 basically try to manufacture charges against me. But I</p> <p>11 would also say that I filed complaints against them with</p> <p>12 equal opportunity services and with the committee of</p> <p>13 Counsel on Academic Freedom and Responsibility. The</p> <p>14 Committee on Academic Freedom and Responsibility found</p> <p>15 in my favor, and it was largely based on that, that the</p> <p>16 same dean to whom this memo is addressed took steps to</p> <p>17 vastly increase my salary, give me a named</p> <p>18 professorship, and ultimately restore me to the</p> <p>19 department with full voting privileges. And he also</p> <p>20 brought the term of this department chair to an end,</p> <p>21 which was one of my central demands and prematurely.</p> <p>22 Q. Anything about what the department did in</p> <p>23 response to this complaint in 2009.</p> <p>24 A. I --</p> <p>25 Q. I wasn't finished.</p>	<p style="text-align: right;">Page 40</p> <p>1 me, I would say he remained hostel. The -- his</p> <p>2 successor as department chair, who is the present</p> <p>3 department chair, was, at least initially, in the early</p> <p>4 part of her perm very cooperative. But in light of the</p> <p>5 events that ensued following the defendant's actions,</p> <p>6 she started to become very uncooperative.</p> <p>7 Q. So is it fair to say that within the classics</p> <p>8 department many of the members of the faculty are hostel</p> <p>9 to you?</p> <p>10 MR. SIBLEY: Objection. Form.</p> <p>11 A. Some.</p> <p>12 Q. (BY MR. PRINGLE JR.) How many?</p> <p>13 A. I really cannot speak to people's subjective</p> <p>14 feelings. I do not know how many would call themselves</p> <p>15 hostel and how many simply don't want to challenge the</p> <p>16 hegemonic faction for their own benefit. I mean,</p> <p>17 obviously, they don't want to be mistreated and</p> <p>18 retaliated against. I mean, there is -- there is a</p> <p>19 sense of herd mentality even among academics who ought</p> <p>20 to be more independent.</p> <p>21 MR. PRINGLE JR.: Objection.</p> <p>22 Nonresponsive.</p> <p>23 Q. (BY MR. PRINGLE JR.) Do you remember what my</p> <p>24 question was?</p> <p>25 A. How many. And I told you I did not know.</p>
<p style="text-align: right;">Page 39</p> <p>1 A. Oh, I am sorry. I thought --</p> <p>2 Q. Anything that was done by the department head</p> <p>3 2009 ever do anything to restore your reputation among</p> <p>4 your colleagues?</p> <p>5 MR. SIBLEY: Objection. Form.</p> <p>6 A. Did the department do anything to restore my</p> <p>7 reputation? No, not really, but the dean did.</p> <p>8 Q. (BY MR. PRINGLE JR.) Did your reputation</p> <p>9 change, if you know?</p> <p>10 A. I think among some of the more neutral members</p> <p>11 of the faculty, it may have done so as a result of my</p> <p>12 being brought back into the department with full voting</p> <p>13 privileges.</p> <p>14 Q. But your critics continue to pursue in the</p> <p>15 department; is that true?</p> <p>16 A. Yes. Subsequent to 2009 when I came up for</p> <p>17 post-tenure review, I think was around 2011, they did</p> <p>18 try to submit a negative post-tenure review even though</p> <p>19 I had published 19 articles in the six years perceiving</p> <p>20 that. And, again, it was based on these charges of my</p> <p>21 being disruptive because I had taken different sides in</p> <p>22 a couple of tenure cases, and, you know, other</p> <p>23 policy-related issues. So I would certainly say that</p> <p>24 this particular department chair who ceased to be the</p> <p>25 department chair after the dean made a settlement with</p>	<p style="text-align: right;">Page 41</p> <p>1 Q. Okay.</p> <p>2 A. And I cannot read people's minds.</p> <p>3 Q. Okay. Who are the ones that you perceive to be</p> <p>4 hostel to you in the department now?</p> <p>5 A. The hegemonic faction ago that I have been</p> <p>6 referring to consisted of four people who were Steve</p> <p>7 White, this chairman; Leslie Dean Jones, the present</p> <p>8 chairman; Andrew Riggsby, who is for a long time the</p> <p>9 graduate advisor and chair of the graduate study's</p> <p>10 committee; and Paula Perlman, who is now retiring.</p> <p>11 Although, I would say since her decision to retire,</p> <p>12 Perlman has basically removed herself from the</p> <p>13 departmental politics, and I think is perhaps less</p> <p>14 hostel than she perhaps was at one time.</p> <p>15 Q. Maybe doesn't care anymore?</p> <p>16 A. I think that may be an element, but, again, I</p> <p>17 am speculating.</p> <p>18 Q. Yeah. And of the four that you have identified</p> <p>19 as hostel to you in the classics department, how many</p> <p>20 people -- how many faculty members are in the classics</p> <p>21 department?</p> <p>22 A. Two of them are retiring at the end of this</p> <p>23 year, and one of them is attempting to have her line</p> <p>24 moved to another department. And then we have made one</p> <p>25 new hire, so we will have 12 next fall. Right at this</p>

May 25, 2021

42 to 45

<p style="text-align: right;">Page 42</p> <p>1 point, it would be 14. Again, two are retiring, one is 2 moving.</p> <p>3 Q. So just shy of a third of the faculty is 4 hostel to Tom Hubbard in the classics department?</p> <p>5 A. I think that's probably right.</p> <p>6 Q. And who were your allies in the classics 7 department?</p> <p>8 A. Karl Galinsky who has been retired.</p> <p>9 Q. Active faculty.</p> <p>10 A. Huh?</p> <p>11 Q. Active faculty. Who are --</p> <p>12 A. Oh, who are still in the department?</p> <p>13 Q. Yeah. Tell me your allies that are active 14 faculty in the classics department.</p> <p>15 A. Well, in some ways, Jennifer Ebeler, but she 16 herself is engaged in a lawsuit against the University, 17 largely due to conflicts she has had with the department 18 chair. And she was not always an ally. I opposed her 19 tenure, and she knew that. So, you know, we have not 20 always been allies, but more recently I think she and I 21 have come to agree that the department is poorly led and 22 that our graduate program has ceased to be the 23 high-quality program it used to be.</p> <p>24 Q. Okay. So Jennifer Ebeler you believe is one 25 of your allies, current faculty member in classics?</p>	<p style="text-align: right;">Page 44</p> <p>1 in fact had not made a job offer. They had interviewed 2 her, and she was one of only two candidates, the other 3 also being a member of our department. But when the 4 first one turned them down, she thought she was going to 5 get the job, but in fact she did not.</p> <p>6 Q. So then do you have any allies in the classics 7 department that you would consider to be honest people?</p> <p>8 A. To the extent that Palaima is perhaps somewhat 9 sympathetic and understanding of my position, I have no 10 reason to think he is dishonest.</p> <p>11 Q. And he is retiring?</p> <p>12 A. Yes.</p> <p>13 Q. What is the role of an academic advisor?</p> <p>14 A. The term "academic advisor" usually refers to 15 staff and not faculty.</p> <p>16 Q. What is a faculty advisor role?</p> <p>17 A. Well, we do have both, an undergraduate and 18 graduate advisor.</p> <p>19 Q. And I asked you earlier --</p> <p>20 A. And --</p> <p>21 Q. I am sorry. Go ahead.</p> <p>22 A. The graduate advisor meets briefly with each of 23 the graduate students each semester when they are doing 24 their course planning for the next semester. So he 25 meets only with those students who are doing active</p>
<p style="text-align: right;">Page 43</p> <p>1 A. Uh-huh.</p> <p>2 Q. Anybody else?</p> <p>3 A. None of them that are willing to talk with me 4 about the current state of the department. Although, I 5 do believe that Tom Palaima, who is one of the two 6 retiring faculty in addition to Perlman, is more 7 sympathetic than some of the others. But you see, most 8 of my allies have been chased out of the department.</p> <p>9 MR. PRINGLE JR.: Objection.</p> <p>10 Nonresponsive.</p> <p>11 Q. (BY MR. PRINGLE JR.) Jennifer Ebeler, your 12 ally in the classics department, you've had your 13 differences with her?</p> <p>14 A. Oh, yes.</p> <p>15 Q. But you consider herself to be an upright 16 person?</p> <p>17 A. Not entirely.</p> <p>18 Q. Okay. Do you consider her to be an honest 19 person?</p> <p>20 A. I think there was some real questions 21 surrounding the claim of an outside job offer from the 22 University of Southern California where I believe that 23 the evidence suggest that she was not truthful about 24 receiving that job offer or about the salary of this 25 opposing job offer, as it was later discovered that USC</p>	<p style="text-align: right;">Page 45</p> <p>1 coursework, not the students who are at dissertation 2 level. And at this point, I would say we have fewer 3 than 15 students doing coursework. So it is not that 4 many students that the graduate advisor meets with, and 5 the current graduate advisor basically just approves 6 whatever they want and really doesn't do much.</p> <p>7 Q. The undergraduate advisor meets with majors, if 8 they want to meet with him, but his approval of their 9 course choices is not required. Most undergraduates 10 meet with the staff member who does academic advisement? 11 And is that -- is that Susan Summers now?</p> <p>12 A. Yes.</p> <p>13 Q. And she is faculty -- faculty member?</p> <p>14 A. No. She is a staff.</p> <p>15 Q. All right. And I asked you earlier if you ever 16 served as -- I thought I asked if you'd ever served as 17 an academic advisor, and you said you had not, correct?</p> <p>18 A. Unless you mean as academic advisor, the 19 director of dissertation or masters thesis. I certainly 20 have served in that capacity, but I have never been the 21 undergraduate or graduate advisor.</p> <p>22 Q. And that was because -- you attributed that to 23 the leadership being bias against you?</p> <p>24 A. I am paraphrasing.</p> <p>25 Q. Yes. There is a certain -- I mean, the four</p>

<p style="text-align: right;">Page 46</p> <p>1 people that I identified as the hegemonic faction were</p> <p>2 all the prodigies of a certain former department chair</p> <p>3 who for various reasons did not like me because I was</p> <p>4 not as enthusiastic about his prodigies as he was.</p> <p>5 Q. And as the academic advisor to undergraduates,</p> <p>6 that's the role where the faculty member meets with the</p> <p>7 undergraduates if they desire, majors?</p> <p>8 A. Yeah, right. And the majority of them did not</p> <p>9 meet with him.</p> <p>10 Q. Okay. That's --</p> <p>11 A. And it's really sinecure.</p> <p>12 Q. And that's -- and you have not been asked to</p> <p>13 serve in that capacity, correct?</p> <p>14 A. No.</p> <p>15 Q. All right. Has anyone ever articulated</p> <p>16 justification for you not serving in that capacity</p> <p>17 because they are concerned that you would run off majors</p> <p>18 or run off students?</p> <p>19 A. That has never been alleged as their reasons.</p> <p>20 Q. What were their reasons?</p> <p>21 A. Well, Steve White, the chair who wrote this</p> <p>22 memorandum that you presented as Exhibit 1 as part of</p> <p>23 his dossier the dean asked him to compile, said that,</p> <p>24 well, because all these reasons we cannot possibly ask</p> <p>25 him to serve in these jobs. But of course, none of</p>	<p style="text-align: right;">Page 48</p> <p>1 never documented that. His sole documentation was a</p> <p>2 statement from Robert Caster at Princeton who was one of</p> <p>3 the three external reviewers of the department when it</p> <p>4 had its mandatory external review, which, you know,</p> <p>5 departments are asked to do approximately every ten</p> <p>6 years. And in the course of that review, this faction</p> <p>7 tried to blame all of the department's problems on me.</p> <p>8 I was in Germany at the time of the review, so I was not</p> <p>9 able to meet with these reviewers. There was a</p> <p>10 subsequent e-mail about -- from Caster to this</p> <p>11 department chair in which he asked, why haven't you</p> <p>12 gotten rid of Tom Hubbard yet. But his sole impression</p> <p>13 is what he had been told by that faction without having</p> <p>14 discussed it with me. Once I became aware of Caster's</p> <p>15 e-mail under an open records request, I e-mailed him</p> <p>16 myself and said, what is the basis for your thinking</p> <p>17 this. And he admitted that it was solely on the basis</p> <p>18 on what he had been told by Steve White and other</p> <p>19 members of that faction whom he trusted. He said that</p> <p>20 he had not heard anything from any of his students at</p> <p>21 Princeton to this effect. And we have had</p> <p>22 undergraduates who went into the graduate program at</p> <p>23 Princeton. And I remember Jake Mackey, and, you know,</p> <p>24 Caster said that he had not heard anything negative</p> <p>25 about me from them, nor from Larry Kim who was an</p>
<p style="text-align: right;">Page 47</p> <p>1 these reasons had anything to do with my actual</p> <p>2 competence to serve on the jobs, and I do not recall</p> <p>3 there being because of any statement that I would run</p> <p>4 people off.</p> <p>5 Q. Well, there is a statement on Page 3 that you</p> <p>6 have a history of bullying students that has been widely</p> <p>7 known in the profession?</p> <p>8 MR. SIBLEY: Objection. Form.</p> <p>9 Q. (BY MR. PRINGLE JR.) That was alleged,</p> <p>10 correct?</p> <p>11 MR. SIBLEY: Objection. Form.</p> <p>12 A. Well, he may have alleged that. Now, part of</p> <p>13 the file that you should have seen was a detailed</p> <p>14 response amounting to close to 500 pages with all the</p> <p>15 exhibits in which I refuted every single one of the</p> <p>16 charges this department chair made. And that is part of</p> <p>17 the reason why the dean ultimately gave me a huge salary</p> <p>18 increase and restored me to the department and told this</p> <p>19 department chair that he should not continue. If I may,</p> <p>20 I would like to review the paragraph --</p> <p>21 Q. Sure. Please do.</p> <p>22 A. -- that you allude to. Is this 4A?</p> <p>23 Q. Indeed.</p> <p>24 A. Okay. His history of bullying students has</p> <p>25 become widely known in the profession. Okay. White</p>	<p style="text-align: right;">Page 49</p> <p>1 assistant professor in our department who was denied</p> <p>2 tenure and was a Princeton Ph.D. and kept in touch with</p> <p>3 people at Princeton. So the two people who were at</p> <p>4 Princeton who actually knew something about our</p> <p>5 department had never said anything negative about me at</p> <p>6 all. Caster's impression was solely based on what he</p> <p>7 heard during his visit as an external reviewer.</p> <p>8 MR. PRINGLE JR.: Objection.</p> <p>9 Nonresponsive.</p> <p>10 Q. (BY MR. PRINGLE JR.) I thought you were going</p> <p>11 to read that slightly to yourself. That's what you</p> <p>12 asked to do, is you wanted to review the paragraph. Go</p> <p>13 ahead and review. Just review it, but I am not asking</p> <p>14 you a question right now.</p> <p>15 A. Well, he also says --</p> <p>16 Q. I haven't asked you a question yet. Have you</p> <p>17 reviewed the paragraph?</p> <p>18 A. (Complying.) Yes. I have reviewed the</p> <p>19 paragraph.</p> <p>20 Q. Can we agree that there is an allegation you</p> <p>21 have a history of bullying students that's been widely</p> <p>22 known in the profession?</p> <p>23 MR. SIBLEY: Objection. Form.</p> <p>24 A. The sole documentation, which is --</p> <p>25 Q. (BY MR. PRINGLE JR.) I didn't ask you about</p>

May 25, 2021

50 to 53

<p style="text-align: right;">Page 50</p> <p>1 the documentation. Can we agree that there's that</p> <p>2 allegation?</p> <p>3 MR. SIBLEY: Objection. Form.</p> <p>4 A. From Robert Caster and Robert Caster only, and</p> <p>5 I have explained where Caster came up with that. It was</p> <p>6 not directly from any student who has ever worked with</p> <p>7 me.</p> <p>8 Q. All right.</p> <p>9 A. And --</p> <p>10 Q. Is --</p> <p>11 A. May I continue?</p> <p>12 Q. Well, I haven't really asked you a question.</p> <p>13 A. Well, you did ask a question about whether</p> <p>14 there was this reputation in the profession.</p> <p>15 Q. No. That's not the question that I asked, sir.</p> <p>16 Listen very closely to my question. It's important you</p> <p>17 understand the question that I am asking you so you can</p> <p>18 answer that question. Okay?</p> <p>19 A. I thought you asked, did I have reputation of</p> <p>20 bullying in the profession.</p> <p>21 Q. No, that's not what I asked. You need to</p> <p>22 listen very closely to my question. Can we agree that</p> <p>23 there's an allegation that you had a history of bullying</p> <p>24 students that's widely known in the profession?</p> <p>25 MR. SIBLEY: Objection. Form.</p>	<p style="text-align: right;">Page 52</p> <p>1 Larry Kim was denied tenure, Andrew Faulkner had an</p> <p>2 outside job offer that was not matched, Edward Boucher</p> <p>3 whom we pointed at the senior level was so disgusted</p> <p>4 that he left after two years.</p> <p>5 MR. PRINGLE JR.: Objection.</p> <p>6 Nonresponsive.</p> <p>7 Q. (BY MR. PRINGLE JR.) So you don't know whether</p> <p>8 that statement is true or not?</p> <p>9 A. At the time that this was written in 2018, I</p> <p>10 was not on the admissions committee, so I can't attest</p> <p>11 one way or the other.</p> <p>12 Q. So you don't know if the reason that</p> <p>13 applications in your area, Greek poetry, especially from</p> <p>14 strong programs, have fallen off considerable in recent</p> <p>15 years because you were the sole specialist in that area?</p> <p>16 MR. SIBLEY: Objection. Form.</p> <p>17 Q. (BY MR. PRINGLE JR.) You don't know that, do</p> <p>18 you?</p> <p>19 MR. SIBLEY: Objection. Form.</p> <p>20 A. I can only speculate, and I just explained to</p> <p>21 you that having only one faculty member in that area as</p> <p>22 opposed to Latin literature where we had several</p> <p>23 faculty, is the more likely explanation than anything to</p> <p>24 do directly with me.</p> <p>25 Q. (BY MR. PRINGLE JR.) And that's pure</p>
<p style="text-align: right;">Page 51</p> <p>1 A. Steve White does make that allegation.</p> <p>2 Q. Okay. The next sentence says, applications in</p> <p>3 your area of Greek poetry, especially from strong</p> <p>4 programs, has fallen off considerable in recent years as</p> <p>5 faculty attrition has left him our sole specialist in</p> <p>6 that area; is that true? That's a yes or no question.</p> <p>7 MR. SIBLEY: Objection. Form.</p> <p>8 A. I would like to answer with a more detailed</p> <p>9 response than yes or no.</p> <p>10 Q. (BY MR. PRINGLE JR.) First tell me --</p> <p>11 A. May I?</p> <p>12 Q. First tell me if it is true or not?</p> <p>13 MR. SIBLEY: Objection. Form.</p> <p>14 A. I don't really know as I was not on the</p> <p>15 admission's committee.</p> <p>16 Q. (BY MR. PRINGLE JR.) Okay. If you don't know,</p> <p>17 you don't know.</p> <p>18 A. But I would like to add to that. That the fact</p> <p>19 of their being only one specialist in that area is</p> <p>20 itself the explanation whereas we previously had several</p> <p>21 people specializing in that area. Having one person in</p> <p>22 Greek literature is not typical for graduate programs in</p> <p>23 classics.</p> <p>24 Q. So --</p> <p>25 A. The other people who specialized, I mean,</p>	<p style="text-align: right;">Page 53</p> <p>1 speculation on your part, isn't it?</p> <p>2 MR. SIBLEY: Objection. Form.</p> <p>3 A. Your question only called for speculation since</p> <p>4 I do not -- I do not have the data on which this</p> <p>5 statement is made.</p> <p>6 Q. (BY MR. PRINGLE JR.) Okay. Prospective</p> <p>7 students visiting the department often voice concerns</p> <p>8 about working with him, Tom Hubbard; is that true?</p> <p>9 A. They haven't voiced them to me.</p> <p>10 Q. That's not my question. Do you know if</p> <p>11 prospective students visiting the department how often</p> <p>12 voiced concerns about working with you?</p> <p>13 A. No, I do not.</p> <p>14 Q. Okay. Have you --</p> <p>15 A. But the fact that the dean ultimately did not</p> <p>16 give credence to White's charges, you know, made a very</p> <p>17 generous settlement with me and asked this department</p> <p>18 chair to step down should impeach the credibility of</p> <p>19 what this department chair says.</p> <p>20 Q. With all due respect, Professor --</p> <p>21 MR. PRINGLE JR.: Objection nonresponsive.</p> <p>22 Q. (BY MR. PRINGLE JR.) You just don't know</p> <p>23 whether prospective students have voiced concerns about</p> <p>24 working with you?</p> <p>25 A. I have seen no --</p>

May 25, 2021

54 to 57

<p style="text-align: right;">Page 54</p> <p>1 MR. SIBLEY: Objection. Form.</p> <p>2 A. I have seen no evidence to that effect.</p> <p>3 Q. (BY MR. PRINGLE JR.) Okay. Did you ask the</p> <p>4 dean, Randy Diehl, or the -- or the chair of the</p> <p>5 classics department whether that's true?</p> <p>6 A. Not that I remember, but he has not presented</p> <p>7 any documentation of that effect.</p> <p>8 Q. If you got a copy of an e-mail or report that</p> <p>9 prospective students voiced concerns about working with</p> <p>10 you, why in the world didn't you ask, give me some</p> <p>11 details on that so I can correct my behavior?</p> <p>12 MR. SIBLEY: Objection. Form.</p> <p>13 Q. (BY MR. PRINGLE JR.) Why didn't you do that?</p> <p>14 MR. SIBLEY: Objection. Form.</p> <p>15 A. I only received a copy of this in my open</p> <p>16 records request, which was some years later, and, you</p> <p>17 know, was part of my filing a grievance against that</p> <p>18 chair, so he was hardly likely to talk to me about it.</p> <p>19 Q. (BY MR. PRINGLE JR.) Now, Professor, you saw</p> <p>20 this when you responded to this, didn't you?</p> <p>21 A. Yes, that was at the time of filing a grievance</p> <p>22 against that chair.</p> <p>23 Q. Are you telling me that you had no opportunity</p> <p>24 to respond to this?</p> <p>25 A. I did in the -- in the complaint to the</p>	<p style="text-align: right;">Page 56</p> <p>1 A. Oh, no, of course I care.</p> <p>2 Q. If you cared that people were -- prospective</p> <p>3 students visiting the department voiced concerns about</p> <p>4 working with you. If you cared, why didn't you ask any</p> <p>5 questions?</p> <p>6 MR. SIBLEY: Objection. Form.</p> <p>7 A. I think that in my response to this I did point</p> <p>8 out that this was a charge made with no evidence.</p> <p>9 Q. (BY MR. PRINGLE JR.) How do you know? You</p> <p>10 didn't ask.</p> <p>11 A. My opinion at the time was if there was actual</p> <p>12 evidence he would have provided it as part of this</p> <p>13 dossier or the subsequent dossier that he submitted as</p> <p>14 part of the post-tenure review process. I, myself, was</p> <p>15 never made aware of this document here until after the</p> <p>16 post-tenure review. And it was only at that point that</p> <p>17 he actually gave me a detailed document outlining his</p> <p>18 charges against me.</p> <p>19 Q. You must have been aware of it because you</p> <p>20 responded to it, though; isn't that right?</p> <p>21 MR. SIBLEY: Objection. Form.</p> <p>22 A. Yes. I responded to it in the form of a</p> <p>23 complaint to the Committee of Counsel on Academic</p> <p>24 Freedom and Responsibility. And my complaint the was</p> <p>25 upheld --</p>
<p style="text-align: right;">Page 55</p> <p>1 committee of counsel on academic freedom and</p> <p>2 responsibility, and the committee upheld my complaint.</p> <p>3 MR. PRINGLE JR.: Objection.</p> <p>4 Nonresponsive.</p> <p>5 Q. (BY MR. PRINGLE JR.) When you found out about</p> <p>6 it, why didn't you do anything to investigate whether it</p> <p>7 was true that students don't want to work with you?</p> <p>8 A. I did not expect to receive an honest response</p> <p>9 from this department chair.</p> <p>10 Q. But you didn't even -- you didn't even see what</p> <p>11 the response was to see if it was honest or not?</p> <p>12 A. He presented no documentation. He never named</p> <p>13 any prospective students.</p> <p>14 Q. And you never asked him, did you?</p> <p>15 A. He and I were hardly on speaking on terms at</p> <p>16 that point. I -- if I had demanded documentation, he</p> <p>17 would not have provided it, in my opinion.</p> <p>18 Q. Now, Professor, that would be a great response</p> <p>19 if I asked you if y'all were on speaking terms, but I</p> <p>20 just asked you if you never asked him any details about</p> <p>21 who was complaining they didn't want to work with you,</p> <p>22 you never asked him?</p> <p>23 A. I didn't ask and no details were ever provided</p> <p>24 in any of his documentation.</p> <p>25 Q. Was that because you didn't care?</p>	<p style="text-align: right;">Page 57</p> <p>1 MR. PRINGLE JR.: Objection --</p> <p>2 A. -- that this was a misuse of the post-tenure</p> <p>3 review process.</p> <p>4 MR. PRINGLE JR.: Objection.</p> <p>5 Nonresponsive.</p> <p>6 Q. (BY MR. PRINGLE JR.) Did you know Leoda</p> <p>7 Anderson?</p> <p>8 A. Yes. I remember Leoda.</p> <p>9 Q. And who was she?</p> <p>10 A. She was the departmental secretary when I first</p> <p>11 came to the department. I believe she retired around</p> <p>12 1990, and I really didn't see much of her since then,</p> <p>13 but I did hear she had recently died at the age of 103.</p> <p>14 Q. And did you supervise Leoda?</p> <p>15 A. No.</p> <p>16 Q. As a faculty member at the University of</p> <p>17 Texas -- well, let me ask you this. Describe for me if</p> <p>18 you would your division of labor or division of efforts,</p> <p>19 however you want to characterize it, between your</p> <p>20 working for the foundation, versus working for U.T. Is</p> <p>21 that question clear?</p> <p>22 A. Yes. Well, the foundation was only</p> <p>23 incorporated in 2013.</p> <p>24 Q. Okay.</p> <p>25 A. And in the early years, it was very small. We</p>

May 25, 2021

58 to 61

<p style="text-align: right;">Page 58</p> <p>1 were largely just a program of providing books and 2 educational materials to prisoners. That, you know, was 3 our main activity. Although, we did have the -- and 4 these were largely, but not exclusively gay prisoners. 5 And, you know, outreach to prisoners has been common in 6 gay activist communities going back to the 1970s, 7 although not so much recently.</p> <p>8 So I would say that in the early years this 9 would have been a fairly minor set of commitment. In 10 the last few years, it has become more of a commitment. 11 The department and university have been fully informed 12 of my work with the foundation. I have even been 13 praised for it in the annual review letters that the 14 chair has written.</p> <p>15 Part of our -- I mean, we have three basic 16 duties as professors, teaching, scholarship, and 17 service. And that service can be service to the 18 universities, such as serving on committees or serving 19 in academic advisor positions. But the service can also 20 be service to the profession by serving in capacities 21 with professional organizations as I have done, or it 22 can be national or even international service. And 23 certainly working with a 501(c)(3) that does educational 24 work and academic research is a form of national 25 service. So I have always listed that on my annual</p>	<p style="text-align: right;">Page 60</p> <p>1 scholarship, and I certainly spend a lot of time on 2 that. So if the question is how much is the division 3 between the foundation and my other duties with the 4 University, I would say right now it is probably about 5 50/50.</p> <p>6 Q. Okay. Fair enough.</p> <p>7 A. But in previous years it would have been less 8 than that, and previous years when I had a full-time 9 teaching schedule and when the foundation was smaller.</p> <p>10 Q. So roughly 50/50 now between the foundation and 11 your obligations with the University?</p> <p>12 A. Yes.</p> <p>13 Q. All right. And your obligations with the 14 University you mentioned the three things, teaching, 15 scholarship, and service, correct?</p> <p>16 A. Uh-huh. Uh-huh.</p> <p>17 Q. Yes?</p> <p>18 A. Yes.</p> <p>19 Q. You need to say yes, remember for her.</p> <p>20 A. I remember. Not inarticulate guttural 21 utterances.</p> <p>22 Q. Right.</p> <p>23 A. I will try not to stay uh-huh anymore.</p> <p>24 Q. We all slip into them, but it is normal, but 25 she does need to make a record, so --</p>
<p style="text-align: right;">Page 59</p> <p>1 reports, and it has been acknowledge in the chair's 2 annual letters of evaluation as being a positive 3 contribution that is consistent with my position at the 4 University. No one has ever complained about my work 5 with the foundation.</p> <p>6 MR. PRINGLE JR.: Objection. 7 Nonresponsive.</p> <p>8 Q. (BY MR. PRINGLE JR.) You remember my question? 9 A. The division of labor.</p> <p>10 Q. (BY MR. PRINGLE JR.) Yeah. I am looking for 11 like 50/50, 64/40, 90/10.</p> <p>12 A. My response was that it has grown over the 13 years. At first it was relatively -- a relatively small 14 part of my time. In the last two or three years, it has 15 become a more significant part of my time. I would say 16 that in the last year and a half, given that of my 17 teaching has been fairly minimal, it would be a larger 18 percentage of time. But I have never really thought 19 about what percentage of my time.</p> <p>20 Q. Can you give me an idea of percentage of your 21 waking hours you spend with the foundation business 22 versus the University of Texas class that you teach?</p> <p>23 A. If you are talking specifically about the one 24 class I teach, that would be a relatively small 25 percentage of my time. But one of our other duties is</p>	<p style="text-align: right;">Page 61</p> <p>1 So are all three of those prongs, the 2 teaching, scholarship, and service, part of your 3 obligation to the University?</p> <p>4 A. Yes.</p> <p>5 Q. All right. And part of your service obligation 6 is your involvement with the foundation?</p> <p>7 A. National service does come under that heading.</p> <p>8 Q. So is that true that part of your service 9 obligation with the University is your involvement with 10 the William A. Percy Foundation?</p> <p>11 A. I am not obligated to serve with that specific 12 foundation, but it is true that doing service with 13 national organizations is something that the University 14 counts as service and recognizes and it has recognized.</p> <p>15 Q. And that is something that you would tout as 16 fulfilment of your service obligation, your involvement 17 with William A. Percy Foundation, true?</p> <p>18 A. Yes. I have always listed it on my annual 19 review documents, and it has been acknowledged by the 20 department chair as relevant.</p> <p>21 Q. And part of your involvement with the William 22 A. Percy Foundation is the scholarship and the study 23 that you perform there and in your capacity as a 24 representative of the William A. Percy Foundation; is 25 that true?</p>

May 25, 2021

62 to 65

<p style="text-align: right;">Page 62</p> <p>1 A. Yes, that is part of it.</p> <p>2 Q. All right.</p> <p>3 A. But not the totality of it.</p> <p>4 Q. No, there is plenty of other --</p> <p>5 A. Sure.</p> <p>6 Q. -- scholarship out there that is not connected</p> <p>7 with the William A. Percy Foundation, true?</p> <p>8 A. Yes, plenty of other scholarship that I write.</p> <p>9 Q. But part of your work with the William A. Percy</p> <p>10 Foundation is scholarly in nature?</p> <p>11 A. Yes, and that includes not only things that I</p> <p>12 write but also supervising the projects of others to</p> <p>13 whom we grant money.</p> <p>14 Q. Okay. Now, the William A. Percy Foundation,</p> <p>15 what is it exactly?</p> <p>16 A. It is a 501(c)(3).</p> <p>17 Q. And its purpose is?</p> <p>18 A. To promote gay rights in areas that tend to be</p> <p>19 neglected by mainstream gay organizations like GLAAD and</p> <p>20 HRC.</p> <p>21 Q. What is HRC?</p> <p>22 A. Human Rights Campaign.</p> <p>23 Q. And what does GLAAD stand for?</p> <p>24 A. Gay and Lesbian Association for Antidefamation</p> <p>25 or something like that.</p>	<p style="text-align: right;">Page 64</p> <p>1 suggest that a lot of that is due to discrimination, but</p> <p>2 it is a form of the discrimination that mainstream</p> <p>3 organizations don't want to talk about.</p> <p>4 Q. Is one the ways that gay rights -- let me start</p> <p>5 over. Is one -- is one of the areas that the William A.</p> <p>6 Percy Foundation addresses the criminal justice issues</p> <p>7 of convicted pedophiles?</p> <p>8 MR. SIBLEY: Objection. Form.</p> <p>9 A. I would say sex offenses more broadly, not just</p> <p>10 pedophilia.</p> <p>11 Q. (BY MR. PRINGLE JR.) Including pedophiles?</p> <p>12 A. Yes. People -- yes, who have been accused of</p> <p>13 that would certainly be among the people that we study.</p> <p>14 Q. Okay.</p> <p>15 A. And that does not in any way mean that we don't</p> <p>16 think they did something wrong. I mean, they did.</p> <p>17 Q. I am not suggesting otherwise. What is</p> <p>18 pedophilia?</p> <p>19 A. The scholarly definition of that term as</p> <p>20 defined in the Diagnostic and Statistical Manual of the</p> <p>21 American Psychiatric Association --</p> <p>22 Q. Well, it's a medical definition, isn't it?</p> <p>23 A. It is a medical and psychological definition,</p> <p>24 and it is widely used by people in the field of</p> <p>25 psychology as well as psychiatry. Is that it refers to</p>
<p style="text-align: right;">Page 63</p> <p>1 Q. Yeah. There are two As?</p> <p>2 A. Yes, there were.</p> <p>3 Q. All right. So the William A. Percy Foundation</p> <p>4 promotes gay rights in areas that underserved by more</p> <p>5 mainstream organizations, fair?</p> <p>6 A. Yes. That is correct. Specifically regard to</p> <p>7 criminal justice issues.</p> <p>8 Q. What sort of criminal justice issues affect gay</p> <p>9 rights?</p> <p>10 A. Gay and lesbian people are incarcerated at</p> <p>11 three times the rate of the general population. I mean,</p> <p>12 that has been well-documented in studies like people</p> <p>13 like Ilan Meyer of the Williams Institute at UCLA. And,</p> <p>14 you know, supportive gay prisoners used to be a signal</p> <p>15 issue among the early gay rights movement in the 1970s.</p> <p>16 But since the 1980s, the strategy of a lot of the</p> <p>17 mainstream big organization has been a simulationist in</p> <p>18 nature, and hence their primary issue became gay</p> <p>19 marriage or gay adoption or equal rights in the</p> <p>20 workplace, which, of course, are now federal law thanks</p> <p>21 to the Supreme Court. So it was issues that make gays</p> <p>22 look respectable in the same as everyone else. And</p> <p>23 they've tended to shy away from any admission that gay</p> <p>24 disproportionately have problems with the law, which</p> <p>25 they do. In our research and the research of others</p>	<p style="text-align: right;">Page 65</p> <p>1 a persistent and dominant attraction to children under</p> <p>2 the age of 10 -- or 10 or below.</p> <p>3 Q. Prepubescent children?</p> <p>4 A. Yes.</p> <p>5 Q. A girl who has not yet menstruated, for</p> <p>6 example?</p> <p>7 A. For example. Now, in the 11 to 13 category,</p> <p>8 that actually has a different term in psychology, which</p> <p>9 is hebephilia. And then most postpuberty, the term is</p> <p>10 ephebophilia, which corresponds to what we call</p> <p>11 pederasty in historical scholarship -- historical and</p> <p>12 anthropological scholarship.</p> <p>13 Q. And all of the phenomenon you just described,</p> <p>14 sexual attraction between adult and the prepubescent</p> <p>15 children, preteen children age 10 to 12 --</p> <p>16 A. Uh-huh.</p> <p>17 Q. -- and underaged children age 14 to 17, below</p> <p>18 the age of content, true?</p> <p>19 MR. SIBLEY: Objection. Form.</p> <p>20 A. All of those are sex offenses in our -- in</p> <p>21 American law. Although, the age of consent varies by</p> <p>22 state. In the majority of American states it is 16.</p> <p>23 Q. Can you -- can you -- can you point me on to a</p> <p>24 publication besides the DSM that defines pederasty as</p> <p>25 distinct from pedophilia?</p>

May 25, 2021

66 to 69

<p style="text-align: right;">Page 66</p> <p>1 A. Not off the top of my head, but I would say</p> <p>2 that most people who specialize in sexology understand</p> <p>3 the distinction between these terms, and most</p> <p>4 classicists understand the difference between these</p> <p>5 terms.</p> <p>6 Q. Well, the population you've just described I</p> <p>7 assume is a pretty small sliver of American society,</p> <p>8 right, classicists and those who study sexology, yes?</p> <p>9 A. It is. I would say the majority of the</p> <p>10 American population have never heard the word pederasty</p> <p>11 and probably do not know the difference. But I would</p> <p>12 say, to the common man on the street, and that is the</p> <p>13 legal standard that we have to use in cases of</p> <p>14 defamation, when you say the word "pedophilia" what they</p> <p>15 think of is someone who molest prepubescent children --</p> <p>16 Q. And what --</p> <p>17 A. 5 year olds or 10 year olds. Now, some people</p> <p>18 who are very sloppy, like the Defendant, confuse that</p> <p>19 with talking about adolescent sexuality.</p> <p>20 MR. PRINGLE JR.: Objection.</p> <p>21 Nonresponsive.</p> <p>22 Q. (BY MR. PRINGLE JR.) What evidence do you have</p> <p>23 that most people on the street consider pedophilia to be</p> <p>24 the prepubescent children? What evidence do you have?</p> <p>25 A. The fact that people are so horrified by the</p>	<p style="text-align: right;">Page 68</p> <p>1 A. -- and an illegal relationship in certain</p> <p>2 jurisdictions.</p> <p>3 Q. (BY MR. PRINGLE JR.) Why would -- why would it</p> <p>4 be classified as inappropriate?</p> <p>5 A. Because it is illegal, and because a lot of</p> <p>6 people have the misunderstanding that there is some</p> <p>7 principle of natural law whereby one cannot engage in</p> <p>8 informed contest below a certain age.</p> <p>9 Q. Okay. I tell you what, we have been going</p> <p>10 about an hour and 40 minutes. I didn't tell you that</p> <p>11 any time you want to take a break, we can. If you need</p> <p>12 to use the restroom, make a phone call, talk to Joe,</p> <p>13 stretch your legs, get a drink of water, anything like</p> <p>14 that. You know, mi casa is su casa. You've got</p> <p>15 facilities, coffee, anything you want. Do you want to</p> <p>16 take a break?</p> <p>17 A. I don't need to. We can go on for a while, but</p> <p>18 if others in the room would like to take a break, I am</p> <p>19 certainly willing to.</p> <p>20 MR. PRINGLE JR.: Well, I am at the will of</p> <p>21 the majority. Do you want to take a break, Joe?</p> <p>22 MR. SIBLEY: Yeah. Let's take a ten-minute</p> <p>23 restroom break.</p> <p>24 THE VIDEOGRAPHER: Off the record at 11:40.</p> <p>25 (Recess taken.)</p>
<p style="text-align: right;">Page 67</p> <p>1 term. Whereas relationships between adolescents are</p> <p>2 usually not called pedophilia. If two 16 year olds have</p> <p>3 sexual relations, I do not believe that most people</p> <p>4 would call that pedophilia, even though it is a</p> <p>5 relationship with someone who under Texas law is under</p> <p>6 age.</p> <p>7 Q. Would you agree that setting aside this narrow</p> <p>8 sliver of classicists and sexologists like yourself, the</p> <p>9 average man on the street would consider sex between an</p> <p>10 adult male, say, a 25-year-old male and a 15-year-old</p> <p>11 boy as being pedophilia?</p> <p>12 A. I do not believe they would use that term. I</p> <p>13 mean, they might disapprove of it, but I think most</p> <p>14 people's understanding of pedophilia is molestation of</p> <p>15 children who are not yet of the age of sexual maturity</p> <p>16 or understanding.</p> <p>17 Q. What term do you believe the average man on the</p> <p>18 street, not the classicists or the sexologist like</p> <p>19 yourself, would use to describe sex between a</p> <p>20 25-year-old man and a 14 or 15-year-old boy?</p> <p>21 A. Inappropriate.</p> <p>22 Q. I am not going to let you off that easy.</p> <p>23 MR. SIBLEY: Objection. Form.</p> <p>24 A. An inappropriate relationship --</p> <p>25 Q. And how --</p>	<p style="text-align: right;">Page 69</p> <p>1 THE VIDEOGRAPHER: We are back on the</p> <p>2 record at 11:56. This begins Tape No. 2.</p> <p>3 Q. (BY MR. PRINGLE JR.) Professor, we were</p> <p>4 talking about the William A. Percy Foundation before we</p> <p>5 stopped.</p> <p>6 A. Uh-huh.</p> <p>7 Q. And I asked you a little bit about your</p> <p>8 division of efforts between your faculty position and</p> <p>9 your William A. Percy Foundation involvement.</p> <p>10 Q. You are the president of the William A. Percy</p> <p>11 Foundation; is that right?</p> <p>12 A. Yes.</p> <p>13 Q. And how did you become the president?</p> <p>14 A. Essentially, I founded it.</p> <p>15 Q. Okay.</p> <p>16 A. Got Mr. Percy to agree to let us use his name</p> <p>17 and his famous great-uncles's name.</p> <p>18 Q. All right. So there are actually two William</p> <p>19 A. Percys, aren't there?</p> <p>20 A. They are.</p> <p>21 Q. All right. And is the younger still alive?</p> <p>22 A. He is 87, but, yes, he still exists.</p> <p>23 Q. Okay. All right. Is that William Armstrong</p> <p>24 Percy?</p> <p>25 A. Yes, the third.</p>

May 25, 2021

70 to 73

<p style="text-align: right;">Page 70</p> <p>1 Q. The third? And the other William A. Percy was</p> <p>2 his uncle or great-uncle?</p> <p>3 A. I think great-uncle.</p> <p>4 Q. Okay. Does William A. Percy -- William</p> <p>5 Armstrong Percy, is he still involved with the Percy</p> <p>6 Foundation?</p> <p>7 A. He has never been involved in any formal</p> <p>8 capacity, but, you know, we certainly talk to him and</p> <p>9 let him know what we are doing, and he appreciates it,</p> <p>10 and he gives us some money.</p> <p>11 Q. All right. Now, does the William A. Percy</p> <p>12 Foundation have a website?</p> <p>13 A. Yes.</p> <p>14 Q. And as the president, is it your responsibility</p> <p>15 what's on that website?</p> <p>16 A. It is primarily our vice president who handles</p> <p>17 the website.</p> <p>18 Q. And that is who?</p> <p>19 A. Avi Eindorot.</p> <p>20 Q. But even though the vice president handles it,</p> <p>21 would you agree that as the president you are ultimately</p> <p>22 responsible for everything that is on the website?</p> <p>23 A. I advise him about it.</p> <p>24 Q. And you review it and approve it?</p> <p>25 A. There is not really a formal approval process,</p>	<p style="text-align: right;">Page 72</p> <p>1 A. (Complying.)</p> <p>2 Q. Thank you. There you go. Exhibit 2, you have</p> <p>3 reviewed it?</p> <p>4 A. I pretty much know what's on it.</p> <p>5 Q. All right. In the bio for William Armstong</p> <p>6 Percy Foundation, III --</p> <p>7 A. Uh-huh.</p> <p>8 Q. -- after it talks about his educational</p> <p>9 achievements, and I am reading here it says, sexually</p> <p>10 active since the age of 5. William A. Percy was</p> <p>11 sexually active at the age of 5?</p> <p>12 A. That's what he has told me. I mean, he boasts</p> <p>13 to people about it.</p> <p>14 Q. And why do you as the executive director of the</p> <p>15 William A. Percy Foundation feel a need to advertise</p> <p>16 that on the website introducing acquiring minds to the</p> <p>17 foundation?</p> <p>18 A. It is something he says about himself. It was</p> <p>19 other boys of his own age that he experimented with, and</p> <p>20 he says it is part of the reason that he has always, you</p> <p>21 know, had a healthy sexual appetite, which he has had</p> <p>22 into his 80s.</p> <p>23 Q. So the founder and namesake of the William</p> <p>24 Arm -- William A. Percy Foundation of which you are the</p> <p>25 president touts that his healthy sexual appetite is due</p>
<p style="text-align: right;">Page 71</p> <p>1 but he consults me at least so there are no conflicts.</p> <p>2 Q. And have you -- have you reviewed what's on</p> <p>3 your website?</p> <p>4 A. I believe at least once I probably read</p> <p>5 everything that's there.</p> <p>6 Q. But you believe it was drafted by Avi?</p> <p>7 A. Well, some of the things were written by me,</p> <p>8 some were written by a number of other people. I mean,</p> <p>9 we sort have guest editorials that people can send us,</p> <p>10 and, you know, if we think it is reasonable and</p> <p>11 interesting we will publish it.</p> <p>12 Q. Is the purpose of the website so acquaint</p> <p>13 inquiring minds with what the William A. Percy</p> <p>14 Foundation is and what it does?</p> <p>15 A. Yes.</p> <p>16 Q. I am going to show you something from your</p> <p>17 website and ask you if you have seen it before. You</p> <p>18 know that your bio -- your bio is on the website, right?</p> <p>19 A. Oh, yes. I certainly approved of that.</p> <p>20 Q. Yeah, you better approve that.</p> <p>21 (Exhibit 2 marked.)</p> <p>22 Q. (BY MR. PRINGLE JR.) Exhibit 2 is going to be</p> <p>23 an exert from that website. I just want you to look it</p> <p>24 over. Professor, can I have that back so I can stick a</p> <p>25 sticker on and otherwise I will lose it.</p>	<p style="text-align: right;">Page 73</p> <p>1 to the fact that he was sexually active at the age of 5?</p> <p>2 A. Well, he is not the founder, I am the founder.</p> <p>3 Q. He is the namesake?</p> <p>4 A. Yes, one of the two. And, yes, I mean, he</p> <p>5 likes boasting about himself. He has also boasted that</p> <p>6 he has had 30,000 sexual partners during his life.</p> <p>7 Q. Beginning at the age of 5?</p> <p>8 A. Yes.</p> <p>9 Q. Do you know whether William Armstrong Percy was</p> <p>10 ever sexually molested by an adult?</p> <p>11 A. He would not call it molestation, but he has</p> <p>12 told me that as an adolescent he actively seduced</p> <p>13 adults, that he was very attracted to soldiers. This</p> <p>14 would have been back in the aftermath of World War II.</p> <p>15 And when he was traveling from his home in Memphis to</p> <p>16 his prepschool in the northeast he would frequently see</p> <p>17 soldiers on the train and proposition them.</p> <p>18 Q. So can we agree that an adult who has sex with</p> <p>19 a 5 year old is by definition a pedophile?</p> <p>20 A. Yes.</p> <p>21 Q. All right. In the introductory materials to</p> <p>22 the foundation of which you are the president and which</p> <p>23 Mr. Percy is one of the namesakes, do you ever</p> <p>24 distinguish that the namesake's sexual activity at the</p> <p>25 age of 5 was not with adult men?</p>

May 25, 2021

74 to 77

<p style="text-align: right;">Page 74</p> <p>1 A. No, we did not say that.</p> <p>2 Q. Okay.</p> <p>3 A. But that is my understanding, is it was with</p> <p>4 other boys in the neighborhood.</p> <p>5 Q. Okay. Do you think that somebody reviewing</p> <p>6 this could come to the collusion that this endorses</p> <p>7 sexual activity at the age of 5?</p> <p>8 MR. SIBLEY: Objection. Form.</p> <p>9 A. No.</p> <p>10 Q. (BY MR. PRINGLE JR.) Certainly doesn't condemn</p> <p>11 it, does it?</p> <p>12 A. No.</p> <p>13 Q. Just nonjudgmental one way or the other?</p> <p>14 A. It is nonjudgmental about 5 year old</p> <p>15 experimenting with 5 year old.</p> <p>16 Q. But that's what it says, does it?</p> <p>17 A. It happens much more often than you might</p> <p>18 think.</p> <p>19 Q. But it doesn't says that Dr. Percy was sexually</p> <p>20 active with other 5 year old, it just says that he was</p> <p>21 sexual active since the age of five?</p> <p>22 A. Yes. We did not want to make the biographies</p> <p>23 overly long or filled with unnecessary detail.</p> <p>24 Q. How do you think a pedophile would read that</p> <p>25 phrase, sexually active since the age of 5?</p>	<p style="text-align: right;">Page 76</p> <p>1 MR. SIBLEY: Objection. Form.</p> <p>2 A. As long as his activity was consensual and with</p> <p>3 other kids his own age who also consented, I do not</p> <p>4 think that is immoral.</p> <p>5 Q. But none of those qualifiers are in the bio,</p> <p>6 are they?</p> <p>7 A. Perhaps we should have put them there.</p> <p>8 Q. Why? So that nobody might get the impression</p> <p>9 that you endorse sex with minors, sex with children?</p> <p>10 MR. SIBLEY: Objection. Form.</p> <p>11 A. We might make that clearer if we added those</p> <p>12 details, and I will talk with our webmaster and</p> <p>13 appreciate your suggestion that we ought to.</p> <p>14 Q. (BY MR. PRINGLE JR.) Okay. So you can</p> <p>15 appreciate the suggestion that one might come to the</p> <p>16 conclusion that it is a pro-pedophile organization --</p> <p>17 MR. SIBLEY: Objection. Form.</p> <p>18 Q. (BY MR. PRINGLE JR.) -- absent that</p> <p>19 clarification you are going to make?</p> <p>20 MR. SIBLEY: Objection. Form.</p> <p>21 A. I believe anyone looking at our website would</p> <p>22 review the rest of the contents of the website and</p> <p>23 realize our agenda is rather different from that and is</p> <p>24 not even focused specifically on the age of contest,</p> <p>25 although it is one of a range of issues that we look --</p>
<p style="text-align: right;">Page 75</p> <p>1 MR. SIBLEY: Objection. Form.</p> <p>2 A. Well, you are asking me to speculate.</p> <p>3 Q. (BY MR. PRINGLE JR.) I am. How do you think a</p> <p>4 pedophile would read that?</p> <p>5 A. As confirming Sigmund Freud's doctrine that we</p> <p>6 have all have sexual instincts from a very young age. I</p> <p>7 mean, this is a common place in the history of</p> <p>8 psychologist, not just Freud, Melanie Klein, you know,</p> <p>9 who is a Freud and disciple who specialized in</p> <p>10 developmental psychology, have all acknowledged that</p> <p>11 even at that young age kids enjoy playing with their</p> <p>12 private parts.</p> <p>13 Q. And at that age, do kids enjoy playing with</p> <p>14 adult's private parts?</p> <p>15 MR. SIBLEY: Objection. Form.</p> <p>16 A. Some of them might. I don't know. I mean, I</p> <p>17 never had any experience with that. I mean, I was not</p> <p>18 sexually active until I was an adult.</p> <p>19 Q. (BY MR. PRINGLE JR.) But to you it is not</p> <p>20 jarring at all that the bio for the namesake of the</p> <p>21 William A. Percy Foundation touts the fact that the</p> <p>22 namesake was sexually active at the age of 5?</p> <p>23 MR. SIBLEY: Objection. Form.</p> <p>24 Q. (BY MR. PRINGLE JR.) You are not troubled at</p> <p>25 all by that, are you?</p>	<p style="text-align: right;">Page 77</p> <p>1 that we sponsor research on.</p> <p>2 Q. (BY MR. PRINGLE JR.) That's assuming that the</p> <p>3 inquiring mind visiting your website and wondering who</p> <p>4 you are gets past the fact that the namesake is proudly</p> <p>5 proclaiming his sexual emancipation at the age of 5?</p> <p>6 MR. SIBLEY: Objection. Form.</p> <p>7 A. As I answered in response to the previous</p> <p>8 question, I believe they are going to read more than</p> <p>9 that.</p> <p>10 Q. (BY MR. PRINGLE JR.) And you do condemn</p> <p>11 pedophilia, don't you? You do condemn pedophilia?</p> <p>12 A. Oh, yes, absolutely.</p> <p>13 Q. You condemn pederasty?</p> <p>14 A. It depends upon the cultural context. I think</p> <p>15 it is wrong to do it in a jurisdiction where it is</p> <p>16 against the law, and I condemn any violation of the law</p> <p>17 unless it is an explicit act of civil disobedience to</p> <p>18 test the law through the judicial system, such as</p> <p>19 happened in the desegregation struggles of the early</p> <p>20 60s.</p> <p>21 Q. Understood. Do you condemn pederasty in the</p> <p>22 modern world?</p> <p>23 MR. SIBLEY: Objection. Form.</p> <p>24 A. In those jurisdictions where it is illegal.</p> <p>25 Q. (BY MR. PRINGLE JR.) All right.</p>

May 25, 2021

78 to 81

<p style="text-align: right;">Page 78</p> <p>1 A. Which is -- well, depending on the age, I mean,</p> <p>2 some states like California where I live have an</p> <p>3 absolute age of contest of 18 with the age gap</p> <p>4 expectation, so I think people in California should not</p> <p>5 do it.</p> <p>6 Q. Do you think pederasty today is immoral?</p> <p>7 A. I believe any violation of the law is unless it</p> <p>8 is specifically, as I mentioned, civil disobedience with</p> <p>9 the express purpose of testing a law in court.</p> <p>10 Q. Now, my question is not whether it is legal.</p> <p>11 My question is whether you believe it is immoral.</p> <p>12 MR. SIBLEY: Objection. Form.</p> <p>13 Q. (BY MR. PRINGLE JR.) You understand the</p> <p>14 distinguish between --</p> <p>15 A. Only with that proviso.</p> <p>16 Q. You understand the distinction between illegal</p> <p>17 and immoral?</p> <p>18 MR. SIBLEY: Objection. Form.</p> <p>19 A. Yes, I do.</p> <p>20 Q. (BY MR. PRINGLE JR.) What is it?</p> <p>21 A. Illegal is anything that is in violation of the</p> <p>22 laws. Moral is contingent upon the perceiving subjects</p> <p>23 sins of morality.</p> <p>24 Q. All right. With that understanding, do you</p> <p>25 believe that pederasty, under your sense of morals, is</p>	<p style="text-align: right;">Page 80</p> <p>1 mentioned that have lower ages of contest, there are</p> <p>2 also provisions of the law that illegalize or render</p> <p>3 unlawful those kinds of relationships.</p> <p>4 Q. And why should pederasty be punished severely</p> <p>5 in those contingencies that you just mentioned?</p> <p>6 MR. SIBLEY: Objection. Form.</p> <p>7 A. Because there is a possibility -- an enhanced</p> <p>8 likelihood that the relationship might involve</p> <p>9 manipulation or some kind of special award that would</p> <p>10 not constitute a complete exercise of freewill on the</p> <p>11 part of the younger partner.</p> <p>12 Q. (BY MR. PRINGLE JR.) You would agree then that</p> <p>13 any sexual relations between an adult male and, say, a</p> <p>14 14-year-old boy that had any aspect of corrosion,</p> <p>15 promise of an award, financial award, any sort of</p> <p>16 corrosion at all is immoral?</p> <p>17 MR. SIBLEY: Objection. Form.</p> <p>18 A. Yes.</p> <p>19 Q. (BY MR. PRINGLE JR.) Okay. And how do we know</p> <p>20 whether that has occurred?</p> <p>21 A. It would be based upon the young person's</p> <p>22 testimony.</p> <p>23 Q. What about the -- what about the adult? How</p> <p>24 does he know whether pederasty is immoral or not?</p> <p>25 A. Adults have an obligation to be informed of the</p>
<p style="text-align: right;">Page 79</p> <p>1 immoral?</p> <p>2 A. It is not immoral in Germany or Italy or</p> <p>3 Austria or a number of other European and advanced Asian</p> <p>4 countries because it is not against the law there. I do</p> <p>5 believe it is immoral in California and Florida where</p> <p>6 all sexual activity under the age of 18 is against the</p> <p>7 law. And I -- because I do not think that anyone can</p> <p>8 justify violating those laws as an act of civil</p> <p>9 disobedience.</p> <p>10 Q. You are telling me where you think it is</p> <p>11 illegal. I want to know where you think it is immoral.</p> <p>12 MR. SIBLEY: Objection. Form.</p> <p>13 Q. (BY MR. PRINGLE JR.) Is your --</p> <p>14 A. In jurisdictions where it is illegal.</p> <p>15 Q. Okay. And wherever else it is okay? It</p> <p>16 doesn't violate any sense of morality that you might</p> <p>17 have?</p> <p>18 A. Well, again, it is contingent on all kinds of</p> <p>19 if clauses. If it involves someone in a supervisory</p> <p>20 position over a minor, like a teacher or a therapist or</p> <p>21 a medical doctor or, you know, a court-appointed</p> <p>22 guardian, that would certainly be very immoral and</p> <p>23 should be punished by the criminal law.</p> <p>24 Q. (BY MR. PRINGLE JR.) And --</p> <p>25 A. And in most of the jurisdictions that I've</p>	<p style="text-align: right;">Page 81</p> <p>1 laws in the jurisdiction of their residence, and I think</p> <p>2 on a basic moral level, they have an obligation to</p> <p>3 ensure informed contest, not just contest, but informed</p> <p>4 contest.</p> <p>5 Q. And you understand a child under the age of</p> <p>6 consent cannot give consent?</p> <p>7 MR. SIBLEY: Objection. Form.</p> <p>8 A. In a purely legal sense.</p> <p>9 Q. (BY MR. PRINGLE JR.) Right?</p> <p>10 A. But I believe that's a legal fiction.</p> <p>11 Q. Say that again.</p> <p>12 A. I believe that the age of consent is a legal</p> <p>13 fiction because it depends upon the individual and the</p> <p>14 circumstances, and these vary greatly from circumstances</p> <p>15 that are violent rape, such as the Defendant has accused</p> <p>16 me of advocating. And I don't advocate at all, I</p> <p>17 condemn that absolutely. It depends on whether there is</p> <p>18 a relationship of supervision or power between the two.</p> <p>19 It depends upon whether there is explicit verbal consent</p> <p>20 on the part of both parties.</p> <p>21 Q. So your position then is pederasty is not</p> <p>22 immoral if it occurs between a minor who consents to</p> <p>23 have sex with the adult?</p> <p>24 A. As long --</p> <p>25 MR. SIBLEY: Objection. Form.</p>

May 25, 2021

82 to 85

<p style="text-align: right;">Page 82</p> <p>1 A. As long as it is legal in the jurisdiction.</p> <p>2 Q. And if there is any sort of supervisory</p> <p>3 relationship between the adult and the child, you would</p> <p>4 condemn it?</p> <p>5 A. Yes.</p> <p>6 Q. Because you would agree that the adult has</p> <p>7 influence and advantages over the child due to years of</p> <p>8 experience, advanced economic position, things like</p> <p>9 that?</p> <p>10 A. I think the more important kind of influence</p> <p>11 would be the influence that a medical provider has in</p> <p>12 terms of, you know, recommending various actions with</p> <p>13 respect to the child or the influence they might have in</p> <p>14 doing an inappropriate examination of the young person,</p> <p>15 such as has happened in all of these scandals involving</p> <p>16 athletic coaches or teen doctors. I mean, I absolutely</p> <p>17 condemn that kind of thing, and I think relationships</p> <p>18 between teachers and students under their supervision</p> <p>19 are wrong.</p> <p>20 Q. So let's say we have age of consent is 14.</p> <p>21 A. Uh-huh.</p> <p>22 Q. And a 23-year-old man hooks up with a boy on --</p> <p>23 what was the site you talked about earlier?</p> <p>24 A. Seeking Arrangement.</p> <p>25 Q. Seeking Arrangement?</p>	<p style="text-align: right;">Page 84</p> <p>1 Q. I am not asking about child prostitution,</p> <p>2 though?</p> <p>3 A. But just giving gifts?</p> <p>4 Q. Yeah. I am asking about giving gifts, wooing</p> <p>5 them, courting the 14 year old with, I guess, theater</p> <p>6 tickets, sports tickets, maybe a new baseball glove,</p> <p>7 things of nature, but you are okay with that as long as</p> <p>8 the child is above the hypothetical age of --</p> <p>9 A. But the ancient --</p> <p>10 MR. SIBLEY: Objection. Form.</p> <p>11 A. The ancient Greeks were okay with that. They</p> <p>12 frequently show on the Vase painting gift-giving.</p> <p>13 Q. (BY MR. PRINGLE JR.) But I am not asking about</p> <p>14 the ancient Greeks, I am asking about now. I am asking</p> <p>15 you what you think about now. You think that's okay?</p> <p>16 MR. SIBLEY: Objection. Form.</p> <p>17 A. Depends on the nature of the gifts. If it is</p> <p>18 something, you know, very minor, it --</p> <p>19 Q. (BY MR. PRINGLE JR.) How about my examples?</p> <p>20 A. -- is something that is incidental. Well, like</p> <p>21 a baseball glove.</p> <p>22 Q. And theater tickets and basketball tickets.</p> <p>23 A. If it's a quid pro quo where I am going to give</p> <p>24 you this baseball glove if you let me have oral sex with</p> <p>25 you, I think that would be objectionable and immoral.</p>
<p style="text-align: right;">Page 83</p> <p>1 A. But anyone has to be 18 to register for that</p> <p>2 site.</p> <p>3 Q. Or at least represent that they are 18, right?</p> <p>4 A. Yeah, pretend to be 18.</p> <p>5 Q. All right.</p> <p>6 A. And, yes, it does happen that younger kids will</p> <p>7 go on saying they are 18 and an adult unwilling gets</p> <p>8 involved with that.</p> <p>9 Q. Work with me on this thought experiment,</p> <p>10 though. 25-year-old man meets up with a kid on one of</p> <p>11 those sites, say, 14-year-old kid, woos the child with</p> <p>12 gifts, maybe theater tickets, sports tickets, things of</p> <p>13 that nature if the child agrees to have sex with that</p> <p>14 adult. Nothing wrong with that in your mind, is there?</p> <p>15 MR. SIBLEY: Objection. Form.</p> <p>16 A. If the adult knows that the younger person is</p> <p>17 younger than the age of consent in their jurisdiction, I</p> <p>18 think that would be wrong and should be punished.</p> <p>19 Q. (BY MR. PRINGLE JR.) But if he is only -- but</p> <p>20 he is 14 and at the age of consent, you are okay with</p> <p>21 that?</p> <p>22 MR. SIBLEY: Objection. Form.</p> <p>23 A. A lot is contingent on the context, child</p> <p>24 prostitution below the 18 is illegal in almost every</p> <p>25 jurisdiction.</p>	<p style="text-align: right;">Page 85</p> <p>1 But if it is part of an ongoing relationship that</p> <p>2 started quite separate from the gifts, that would be</p> <p>3 different.</p> <p>4 Q. (BY MR. PRINGLE JR.) And you would be okay</p> <p>5 with that?</p> <p>6 A. In the jurisdictions where it is legal.</p> <p>7 Q. Okay. And you would be okay with the -- our</p> <p>8 hypothetical 25-year-old man and 14-year-old boy with</p> <p>9 the hypo -- or adult showering the boy with gifts until</p> <p>10 he consents to sex?</p> <p>11 MR. SIBLEY: Objection. Form.</p> <p>12 Q. (BY MR. PRINGLE JR.) Again, expectation or</p> <p>13 quid pro quo.</p> <p>14 MR. SIBLEY: Objection. Form.</p> <p>15 A. I think what you described is a quid pro quo.</p> <p>16 Q. (BY MR. PRINGLE JR.) How?</p> <p>17 A. If he has made it clear that continuing to give</p> <p>18 gifts is going to be contingent upon granting sexual</p> <p>19 favors, I think that's wrong.</p> <p>20 Q. (BY MR. PRINGLE JR.) Well, I am not saying</p> <p>21 there is any sort of understanding in that regard, just</p> <p>22 continuing to give gifts. You okay with that?</p> <p>23 MR. SIBLEY: Objection. Form.</p> <p>24 A. And they are not yet having sex? I think --</p> <p>25 there is nothing wrong with giving young people gifts as</p>

May 25, 2021

86 to 89

<p style="text-align: right;">Page 86</p> <p>1 long as there is no force corrosion or manipulation to</p> <p>2 do something for those gifts.</p> <p>3 Q. (BY MR. PRINGLE JR.) As long as the 14 year</p> <p>4 old is exercising informed consent, correct?</p> <p>5 A. Yes. Yes.</p> <p>6 Q. Okay. Let's talk about when you first met</p> <p>7 Ms. Blakemore?</p> <p>8 A. Was when she was handing out her flyers to my</p> <p>9 class. Otherwise, this was a large class with over 120</p> <p>10 students in it, and she had never come to see me or ask</p> <p>11 me anything.</p> <p>12 Q. And at the time Ms. Blakemore handed out the</p> <p>13 flyers, was she still a member of your class?</p> <p>14 A. No. She said she had dropped it.</p> <p>15 Q. Did she say why she dropped it?</p> <p>16 A. I don't believe she gave a specific reason.</p> <p>17 She just said -- I believe that I'd asked her what grade</p> <p>18 she was getting in the class, and she said, I dropped</p> <p>19 your class.</p> <p>20 Q. You asked her what grade she was getting?</p> <p>21 A. Yes.</p> <p>22 Q. When?</p> <p>23 A. When she was handing out her flyer.</p> <p>24 Q. Why?</p> <p>25 A. Because I find that often if students are</p>	<p style="text-align: right;">Page 88</p> <p>1 media. But the people who have looked at it have told</p> <p>2 me that she was an aspiring model, and, you know, showed</p> <p>3 me a couple of photographs from her page, partly to make</p> <p>4 sure that this was the same person that was in my class,</p> <p>5 and it was.</p> <p>6 Q. But when she handed you the flyer, you didn't</p> <p>7 know her from Adam, did you?</p> <p>8 A. No.</p> <p>9 Q. And at that time she was no longer a student in</p> <p>10 your class?</p> <p>11 A. That's what she said.</p> <p>12 Q. And that's what you confirmed?</p> <p>13 A. Her last grade in the class was on the</p> <p>14 mid-term, which was around October 15th.</p> <p>15 Q. And did she drop your class?</p> <p>16 A. That's what she said and, yes, I think she had</p> <p>17 have a Q drop on the --</p> <p>18 Q. A what drop?</p> <p>19 A. A Q drop.</p> <p>20 Q. What's that?</p> <p>21 A. It means quit. Q for quit.</p> <p>22 Q. Oh. And what do you have to do to get a Q</p> <p>23 drop?</p> <p>24 A. There is a petition that you file with your</p> <p>25 college, and they are almost always approved. The</p>
<p style="text-align: right;">Page 87</p> <p>1 really angry at a professor it is because of some kind</p> <p>2 of objection to their grade or the class being too hard.</p> <p>3 And I am a very tough grader, and I assign a lot of</p> <p>4 work. It is one of the reasons that I am not the most</p> <p>5 popular professor is there is a generalized atmosphere</p> <p>6 of grade inflation at the University of Texas, and there</p> <p>7 has been insufficient administrative attention to that</p> <p>8 issue. My standards are essentially the same as what my</p> <p>9 professor's standards were when I was a student over 40</p> <p>10 years ago because I believe students deserve to get the</p> <p>11 same quality of education I benefited from.</p> <p>12 Q. Do you know anything about Ms. Blakemore other</p> <p>13 than from your interaction with her and her being a</p> <p>14 student in your class? For example, do you know</p> <p>15 anything about her politics?</p> <p>16 A. Yes. One of my teaching assistants looked her</p> <p>17 up and told me that she was the daughter of this</p> <p>18 prominent Republican political activist. I believe</p> <p>19 someone else looked at her Facebook page, which at the</p> <p>20 time stated that she was interested in Republican</p> <p>21 politics.</p> <p>22 Q. Other than that, do you have any knowledge of</p> <p>23 her?</p> <p>24 A. Again, it is -- I have not looked at her</p> <p>25 Facebook page. I don't use Facebook or any social</p>	<p style="text-align: right;">Page 89</p> <p>1 University has grown very lax about letting students do</p> <p>2 that really up until the final exam.</p> <p>3 Q. So what was the reason that she gave for the Q</p> <p>4 drop?</p> <p>5 A. She didn't explain her reason to me me.</p> <p>6 Q. So you have no idea why she dropped your class.</p> <p>7 A. No. Although, my speculation is because she</p> <p>8 wasn't doing well.</p> <p>9 Q. Purely speculation, though?</p> <p>10 MR. SIBLEY: Objection. Form.</p> <p>11 A. Well, I think getting a 48 on the mid-term is a</p> <p>12 sign of not doing well, and that is often -- in fact, in</p> <p>13 most instances, the reason that people drop classes is</p> <p>14 to avoid getting a bad grade on their transcript and</p> <p>15 lower their GPA.</p> <p>16 Q. (BY MR. PRINGLE JR.) But you are guessing why</p> <p>17 she drop the class, aren't you? You don't know?</p> <p>18 MR. SIBLEY: Objection. Form.</p> <p>19 A. It is an educated guess, yes.</p> <p>20 Q. (BY MR. PRINGLE JR.) Is it an educated guess</p> <p>21 only because you're an educated guy?</p> <p>22 MR. SIBLEY: Objection. Form.</p> <p>23 Q. (BY MR. PRINGLE JR.) What did you do to</p> <p>24 educate yourself as that's the reason she dropped it?</p> <p>25 MR. SIBLEY: Objection. Form.</p>

May 25, 2021

90 to 93

<p style="text-align: right;">Page 90</p> <p>1 A. I have 40 years of experience as a teacher. I</p> <p>2 have seen many students drop my classes. It is almost</p> <p>3 always because they are not doing well.</p> <p>4 Q. (BY MR. PRINGLE JR.) But you don't know with</p> <p>5 respect to her, do you?</p> <p>6 A. Not with 100 percent certainty.</p> <p>7 Q. You don't know to any certainty, do you?</p> <p>8 MR. SIBLEY: Objection. Form.</p> <p>9 A. It is an educated guess based upon</p> <p>10 probabilities based on my previous experience with</p> <p>11 students who take Q drops.</p> <p>12 Q. (BY MR. PRINGLE JR.) And so what did you do to</p> <p>13 educate yourself on that guess?</p> <p>14 A. Again, it is based upon 40 years of teaching.</p> <p>15 I mean, 32 years -- no, 33 years of teaching at U.T.</p> <p>16 Q. So I am guessing nothing?</p> <p>17 MR. SIBLEY: Objection. Form.</p> <p>18 A. It is not something I really needed to educate</p> <p>19 myself on. I just knew it from experience that almost</p> <p>20 every student who has taken a Q drop late in the</p> <p>21 semester -- now, of course early in the semester they</p> <p>22 often drop classes just because they are shopping</p> <p>23 around, but if someone drops the class halfway through</p> <p>24 the semester, in almost every case I am familiar with,</p> <p>25 it is because they were doing poorly.</p>	<p style="text-align: right;">Page 92</p> <p>1 students for safety.</p> <p>2 Q. Anybody else you've talked about Sarah other</p> <p>3 than Avi and some of your -- the people that you just</p> <p>4 mentioned?</p> <p>5 A. And my attorneys.</p> <p>6 Q. And your attorneys, yeah.</p> <p>7 A. Well, my teaching assistant.</p> <p>8 Q. Anderson?</p> <p>9 A. No, Zaramian. I mean, he is the one who found</p> <p>10 out that she was a daughter of a prominent political</p> <p>11 strategist or operative who was connected with the</p> <p>12 lieutenant governor.</p> <p>13 Q. Yeah, but that's not her, that's her dad,</p> <p>14 right?</p> <p>15 A. Yes. But it gives you a sense of her</p> <p>16 upbringing, and often at a young age students are very</p> <p>17 influenced in their politics by what their family's</p> <p>18 politics were.</p> <p>19 Q. Well, we know that your father was an abusive</p> <p>20 alcoholic, right?</p> <p>21 A. No, no, that was my grandfather.</p> <p>22 Q. Oh, okay.</p> <p>23 A. My mother's father.</p> <p>24 Q. And your father was?</p> <p>25 A. He was a very -- he was an accountant, a very</p>
<p style="text-align: right;">Page 91</p> <p>1 Q. (BY MR. PRINGLE JR.) Have you ever had any</p> <p>2 discussions with people other than your lawyers about</p> <p>3 Sarah?</p> <p>4 A. With a few people whom we've named in the</p> <p>5 interrogatories.</p> <p>6 Q. And tell me who those people are?</p> <p>7 A. Well, I have Avi Eindorot was one of them</p> <p>8 because he was a journalist and did some research on</p> <p>9 her.</p> <p>10 Q. All right.</p> <p>11 A. He is the one that visited her Facebook page,</p> <p>12 and, you know, saw what her affiliations of interests</p> <p>13 were. Who else? They were various people who have</p> <p>14 heard about the attack on my house and who contacted me</p> <p>15 because they were concerned about me. And I may have</p> <p>16 mentioned that she was the one who started it.</p> <p>17 Q. You told people that Sarah Blakemore started</p> <p>18 the attack on your house?</p> <p>19 A. No, that she started the false rumors that led</p> <p>20 to that attack, and we know now from evidence that we</p> <p>21 have seen in discovery that she was in direct contact</p> <p>22 with the group that did it, and that they only learned</p> <p>23 about me from her --</p> <p>24 Q. What evidence do you have --</p> <p>25 A. -- and her colleagues in her small group</p>	<p style="text-align: right;">Page 93</p> <p>1 moral man who, you know, once told me that the controls</p> <p>2 in his company were so lax that if he wanted to embezzle</p> <p>3 money that he easily could and not be detected. But he</p> <p>4 never did, and the owner of the company absolutely</p> <p>5 trusted him. My father was a military officer who</p> <p>6 served during both War World II and the Korea era, and a</p> <p>7 man of very strict and conservative morality.</p> <p>8 Q. So we can discern your politics from your</p> <p>9 father's?</p> <p>10 MR. SIBLEY: Objection. Form.</p> <p>11 A. I would say we are both to the right</p> <p>12 politically. Although my father would have been more of</p> <p>13 a traditional conservative, and I am more of a</p> <p>14 libertarian.</p> <p>15 Q. (BY MR. PRINGLE JR.) Have you ever met any</p> <p>16 member of Sarah's family?</p> <p>17 A. No.</p> <p>18 Q. Have you ever talked to any of them?</p> <p>19 A. No.</p> <p>20 Q. What do you -- is everything that you know</p> <p>21 about Sarah and her family based on what others have</p> <p>22 told you from review of social media?</p> <p>23 A. Also based upon some of the communications with</p> <p>24 her family that we've seen through discovery.</p> <p>25 Q. All right. And how about Holly Green? Have</p>

May 25, 2021

94 to 97

May 25, 2021

98

Page 98

1 I further certify that I am neither attorney
2 nor counsel for, related to, nor employed by any of the
3 parties to the action in which this testimony was taken.

4 Further, I am not a relative or employee of
5 any attorney of record in this cause, nor do I have a
6 financial interest in the action.

7 Subscribed and sworn to on this 9th day of
8 June, 2021.

9
10
11
12


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May 25, 2021

2

	96	accused	addressed
<hr/>	21:4,5	36:8 64:12	38:16
6	97	81:15	addresses
<hr/>	21:4	achievements	64:6
60s		72:9	administrativ
77:20		acknowledge	e
64/40	A	59:1	87:7
59:11		acknowledged	admission
<hr/>	A-L-A-I-N	61:19 75:10	63:23
7	30:12	acquaint	admission's
<hr/>	a.m.	71:12	51:15
70s	4:2	acquiring	admissions
15:17	able	72:16	52:10
72	48:9	act	admitted
18:25	above	77:17 79:8	48:17
75	84:8	actions	adolescent
19:11	absent	26:22 40:5	10:1 66:19
77	12:14 76:18	82:12	73:12
19:11 20:8	absolute	active	adolescents
791	78:3	42:9,11,13	67:1
5:8	absolutely	44:25 72:10,	adoption
<hr/>	77:12 81:17	11 73:1	63:19
8	82:16 93:4	74:20,21,25	adult
<hr/>	abusive	75:18,22	24:11 65:14
80	92:19	actively	67:10 73:10,
20:8,19	academic	73:12	18,25 75:18
80s	19:6 21:14	activist	80:13,23
72:22	22:2,17 26:8	58:6 87:18	81:23 82:3,6
81	33:22 38:13,	activity	83:7,14,16
20:20	14 44:13,14	58:3 73:24	85:9
82	45:10,17,18	74:7 76:2	adult's
20:20,21	46:5 55:1	79:6	75:14
84	56:23 58:19,	actual	adults
20:21,23	24	34:8 47:1	73:13 80:25
85	academics	56:11 94:10	advanced
20:23	40:19	Adam	79:3 82:8
87	Acadia	88:7	advantages
69:22	16:9,18	add	82:7
<hr/>	accepting	51:18	advertise
9	35:7	added	72:15
<hr/>	access	76:11	advise
90/10	12:15	addition	70:23
59:11	accountant	33:17 36:10	advisement
95	92:25	43:6	45:10
21:5	accounts	address	advisor
95926	18:3	5:7,11 6:10,	33:22 41:9
5:9	accurately	14,21	44:13,14,16,
	10:11		

18,22 45:4, 5,7,17,18,21 46:5 58:19	agrees 83:13	angered 35:5	appreciate 27:15 76:13, 15
advocate 26:3 81:16	ahead 44:21 49:13	angry 26:4 87:1	appreciated 8:17
advocating 81:16	Alain 30:8,12,17 31:1,13	Annandale-on- hudson 20:19	appreciates 70:9
affect 63:8	alcoholic 92:20	annual 58:13,25 59:2 61:18	appropriate 13:18
affected 26:23	Alexander 21:3	answer 5:24 8:1 24:3 50:18 51:8	approval 45:8 70:25
affiliations 91:12	alive 69:21	answered 77:7	approve 70:24 71:20
aftermath 73:14	allegation 36:18 49:20 50:2,23 51:1	answering 8:21 27:4	approved 71:19 88:25
age 18:17 57:13 65:2,15,17, 18,21 67:6, 15 68:8 72:10,11,19 73:1,7,25 74:7,21,25 75:6,11,13, 22 76:3,24 77:5 78:1,3 79:6 81:5,12 82:20 83:17, 20 84:8 92:16	alleged 46:19 47:9, 12	anthropologic al 65:12	approves 45:5
agenda 76:23	allies 37:24 38:1,2 42:6,13,20, 25 43:8 44:6	antichristian 35:11	approximately 15:16 21:9 34:17 48:5
ages 80:1	allowed 26:13	Antidefamatio n 62:24	area 18:19,22 51:3,6,19,21 52:13,15,21
ago 12:19 41:5 87:10	allude 47:22	antireligious 35:11	areas 62:18 63:4 64:5
agree 38:4 42:21 49:20 50:1, 22 67:7 69:16 70:21 73:18 80:12 82:6	ally 42:18 43:12	anxieties 25:18	argumentation 37:11
agreement 4:14	American 64:21 65:21, 22 66:7,10	Anybody 12:20 43:2 92:2	Arm 72:24
	amounting 47:14	anymore 26:14 41:15 60:23	Armstong 72:5
	amounts 18:2	anyone 5:21 6:2,4 10:19 21:19 35:25 46:15 76:21 79:7 83:1	Armstrong 69:23 70:5 73:9
	ancient 10:2 19:24 21:17 22:2 24:22 29:1 33:3 84:9, 11,14	appetite 72:21,25	around 17:8 21:25 25:15 27:10 34:14 39:17 57:11 88:14 90:23
	Anderson 30:8,10 57:7 92:8	applications 51:2 52:13	Arrangement 82:24,25
	Andrew 41:8 52:1		article 9:22,25 10:3,6

articles 9:12,20 25:24 39:19	athletic 82:16	12:22,23 13:2 14:4,6,	basketball 84:22
articulated 46:15	atmosphere 87:5	22,23 70:19 71:6 91:7	Bay 18:19,22
Asian 79:3	attack 25:23 91:14, 18,20	92:3 avoid 89:14	Becky 31:4,7,13
asked 26:13 27:16 44:19 45:15, 16 46:12,23 48:5,11 49:12,16 50:12,15,19, 21 53:17 55:14,19,20, 22 69:7 86:17,20	attempting 41:23	avoided 8:23	beer 14:19
asking 8:2 49:13 50:17 75:2 84:1,4,13,14	attend 11:15 26:13	award 80:9,15	Beert 14:5,11,15 16:5
aspect 80:14	attending 26:14	aware 48:14 56:15, 19	Beert's 14:11
aspiring 88:2	attention 22:14 87:7		beginning 6:24 73:7
assaulted 6:17	attest 52:10	<hr/> B <hr/>	begins 4:2 69:2
assign 87:3	attested 24:22	back 6:13,23 7:1 11:9 18:11 34:21 39:12 58:6 69:1 71:24 73:14	behavior 54:11
assigned 30:2	attorneys 92:5,6	bad 89:14	believe 9:17 21:4 32:8 42:24 43:5,22 57:11 67:3, 12,17 71:4,6 76:21 77:8 78:7,11,25 79:5 81:10, 12 86:16,17 87:10,18
assistant 20:18,22,24 29:25 30:4,6 49:1 92:7	attracted 73:13	badly 34:23	below 65:2,17 68:8 83:24
assistants 30:1,18,22 87:16	attraction 65:1,14	bank 18:2	benefit 17:11 40:16
Association 62:24 64:21	attributed 45:22	Bard 20:18	benefited 87:11
assume 5:18 7:7 19:22 24:2 66:7	attrition 51:5	baseball 84:6,21,24	Berkeley 19:9,10,13
assuming 77:2	August 6:23	based 15:12 38:15 39:20 49:6 80:21 90:9, 10,14 93:21, 23	besides 12:21 14:24 17:16,23 23:15 27:21 65:24
	Austin 6:10,11,21 15:24 17:19, 20 25:24	basic 14:1 58:15 81:2	best 25:16
	Austria 79:3	basically 38:10 41:12 45:5	
	authorities 13:18,23	basis 48:16,17	
	authors 23:17		
	available 17:10		
	average 67:9,17		
	Avi		

better 35:1 71:20	Brian 32:21	capacities 58:20	38:20 39:24, 25 40:2,3
bias 45:23	Brian's 33:17	capacity 45:20 46:13,	41:9 42:18 46:2,21
biblical 35:9	briefly 44:22	16 61:23 70:8	47:16,19 48:11 53:18,
big 63:17	Broadcasting 15:10	care 41:15 55:25	19 54:4,18, 22 55:9
bio 71:18 72:5 75:20 76:5	broadly 23:20 64:9	56:1	58:14 61:20
biographies 74:22	brought 18:10 38:20 39:12	cared 56:2,4	chair's 59:1
birth 5:5	building 36:17	casa 68:14	chairman 41:7,8
bit 33:2 69:7	built 34:13	case 90:24	challenge 40:15
Blakemore 86:7,12 87:12 91:17	bullying 47:6,24 49:21 50:20, 23	cases 7:6 36:11 39:22 66:13	chance 7:7
blame 36:3,6 48:7	business 59:21	Caster 48:2,10,24 50:4,5	change 39:9
board 16:21,23		Caster's 48:14 49:6	changed 23:11
boasted 73:5	<hr/> C <hr/>	category 65:7	characterize 57:19
boasting 73:5	California 5:8 7:1	CC301 29:1	charge 56:8
boasts 72:12	13:23 18:19 19:9 43:22 78:2,4 79:5	ceased 39:24 42:22	charges 38:10 39:20 47:16 53:16 56:18
books 17:25 18:5 58:1	call 15:3 23:24 40:14 65:10 67:4 68:12 73:11	central 38:21	chased 43:8
Boucher 52:2	called 20:14 28:24 53:3 67:2	certain 45:25 46:2 68:1,8	Chico 5:8 11:13 17:22
boy 67:11,20 80:14 82:22 85:8,9	Campaign 62:22	certainly 7:25 20:1 22:7 23:3 38:4 39:23 45:19 58:23 60:1 64:13 68:19 70:8 71:19 74:10 79:22	child 81:5 82:3,7, 13 83:11,13, 23 84:1,8
boys 72:19 74:4	Canada 15:12	certainty 90:6,7	children 24:6,8 65:1, 3,15,17 66:15,24 67:15 76:9
break 68:11,16,18, 21,23	Canadian 15:9,11	chair 36:15,16	choices 45:9
Brennan 32:21	candidates 44:2		cinema 15:22

May 25, 2021

6

circumstances	14,25 43:12	committees	concentrated
81:14	44:6 51:23	58:18	26:17
City	54:5	common	concern
11:12	classified	58:5 66:12	25:19
civil	68:4	75:7	concerned
4:16 77:17	clauses	communication	32:1 46:17
78:8 79:8	79:19	s	91:15
claim	clear	93:23	concerns
43:21	57:21 85:17	communities	13:7,9 53:7,
claims	clearer	58:6	12,23 54:9
7:6	76:11	community	56:3 94:12
Clara	close	11:7,10	conclusion
19:2	47:14	company	76:16
clarification	closely	93:2,4	Concordia
8:2 76:19	50:16,22	Comparative	15:23,25
class	coaches	19:16	16:1,2
24:20 26:14,	82:16	competence	condemn
15 28:11	coffee	47:2	74:10 77:10,
29:15 59:22,	68:15	compile	11,13,16,21
24 86:9,13,	colleagues	46:23	81:17 82:4,
18,19 87:2,	35:8 36:12,	complained	17
14 88:4,10,	15 39:4	59:4	conduct
13,15 89:6,	91:25	complaining	4:15,19
17 90:23	college	26:5 55:21	confirmed
classes	11:7,10,12	complaint	88:12
11:15 24:13,	19:2 20:19,	38:23 54:25	confirming
18 28:15,16	22 34:23	55:2 56:23,	75:5
29:3,6,17	88:25	24	conflicts
89:13 90:2,	colleges	complaints	42:17 71:1
22	35:10	37:16 38:11	confuse
classic	collusion	complete	66:18
31:9	74:6	80:10	connected
classical	come	completely	62:6 92:11
23:24,25	18:8 37:13	22:23	consensual
24:16,20	42:21 61:7	completing	76:2
25:11 27:19	74:6 76:15	30:25	consent
28:13 29:8	86:10	complexities	10:1 65:21
classicists	comes	23:9	81:6,12,19
23:20 66:4,8	22:5 25:23	complicated	82:20 83:17,
67:8,18	commitment	10:13 23:6,	20 86:4
classics	58:9,10	13	consented
16:19 20:10	committee	Complying	76:3
30:13 33:4	38:12,14	49:18 72:1	consents
34:3 36:1	41:10 51:15	comprehensive	81:22 85:10
37:8 38:5	52:10 55:1,2	23:21	consequences
40:7 41:19,	56:23	computer	35:24
20 42:4,6,		32:23 33:4	

conservative 93:7,13	continuing 85:17,22	counts 61:14	crime 15:9
consider 22:24 43:15, 18 44:7 66:23 67:9	continuously 18:12 21:11	couple 9:9 28:4 39:22 88:3	criminal 63:7,8 64:6 79:23
considerable 51:4 52:14	contribution 59:3	course 7:13,15 8:19 10:13 21:18, 21 22:22,23 23:10 24:17 25:5,8,9 26:11,15,18, 21 27:6,13 28:18,19,20 29:16,19 32:25 44:24 45:9 46:25 48:6 56:1 63:20 90:21	critical 36:9 38:8
considered 22:16 23:2	controls 93:1	courses 22:20 23:18 28:21,22 30:23	criticisms 37:2,6
consist 13:25	controversial 38:6	coursework 45:1,3	critics 39:14
consisted 41:6	conversation 94:9	court 4:3,5 5:17 7:5 8:7 63:21 78:9 94:14	cults 24:23
consistent 59:3	conversations 10:19,22 13:5	court- appointed 79:21	cultural 77:14
constitute 80:10	convicted 64:7	courting 84:5	current 5:7 11:1 29:25 42:25 43:4 45:5
consults 71:1	cooperative 40:4	cover 36:18	cut 8:11
contact 91:21	copy 54:8,15	COVID 11:22 28:6	
contacted 91:14 94:11	Cornell 18:10	created 35:19	<hr/> D <hr/>
content 65:18	Corporation 15:10	credence 53:16	
contents 76:22	corpus 25:7	credibility 53:18	
contest 68:8 76:24 78:3 80:1 81:3,4	correct 4:19 11:24 21:11,12 22:1,5 24:3 45:17 46:13 47:10 54:11 60:15 63:6 86:4	Creek 18:20,23	D-O 12:25
contingencies 80:5	corresponds 65:10		D-U-B-R-O 14:8
contingent 78:22 79:18 83:23 85:18	corrosion 80:14,16 86:1		dad 92:13
continue 8:16 17:3 20:4 39:14 47:19 50:11	counsel 38:13 55:1 56:23		Dallas 25:25
continued 29:13 30:21	counting 22:8		data 53:4
	countries 79:4		date 5:5
			daughter 87:17 92:10
			day 24:1 35:8
			deal 29:9
			dealt 33:19
			dean 26:12 35:5

38:16 39:7, 25 41:7 46:23 47:17 53:15 54:4	demanding 26:4 demands 38:21 denied 49:1 52:1 departed 6:21 department 22:22 25:13 27:23 29:16 33:25 34:1, 3,11,23 35:2,14,16, 18,20 36:1, 15,17 37:8, 17,20,22 38:5,19,20, 22 39:2,6, 12,15,24,25 40:2,3,8 41:4,19,21, 24 42:4,7, 12,14,17,21 43:4,8,12 44:3,7 46:2 47:16,18,19 48:3,11 49:1,5 53:7, 11,17,19 54:5 55:9 56:3 57:11 58:11 61:20 94:7,8 department's 38:9 48:7 departmental 41:13 57:10 departments 35:1 48:5 depending 78:1 depends 77:14 81:13, 17,19 84:17 deposition 4:16 5:16 7:2,8 9:4	10:17,20,22, 25 12:21 describe 57:17 67:19 described 65:13 66:6 85:15 desegregation 77:19 deserve 34:24 87:10 design 28:25 desire 46:7 desired 23:22 desires 23:7 destructive 37:7 detail 10:23 74:23 detailed 47:13 51:8 56:17 details 54:11 55:20, 23 76:12 detected 93:3 develop 29:17 developing 29:13 development 35:12 developmental 75:10 devised 22:23 Diagnostic 64:20 died 57:13 Diehl	54:4 difference 66:4,11 differences 43:13 different 16:1 29:15 32:10 39:21 65:8 76:23 85:3 direct 91:21 direction 35:12 directly 32:1 33:18 50:6 52:24 director 15:1 45:19 72:14 directors 13:10 14:1,2 disapprove 67:13 discern 93:8 disciple 75:9 disclose 13:21 discovered 43:25 discovery 9:15 91:21 93:24 discriminatio n 64:1,2 discussed 12:20 48:14 discussions 91:2 disfunction 35:14 disfunctional 34:1
deans 34:22 December 6:16,22 30:22 decide 33:3 decided 33:3 decision 41:11 decisions 35:24 defamation 5:17 66:14 defamatory 10:5 25:18 defend 31:13,14 Defendant 25:19 26:12 66:18 81:15 defendant's 10:5 26:22 40:5 deficiencies 36:19 defined 64:20 defines 65:24 definition 64:19,22,23 73:19 degree 19:4,12,14, 15 20:9,11 30:17 32:22 Delaware 13:24 demand 55:16			

disgusted 52:3	documentation 48:1 49:24	due 11:22 34:19	educate 89:24 90:13, 18
dishonest 44:10	50:1 54:7	42:17 53:20	educated 89:19, 20, 21
disobedience 77:17 78:8	55:12, 16, 24	64:1 72:25	90:9
79:9	documented 48:1	82:7	education 87:11
disproportionately 63:24	documents 9:5, 7, 17	duly 4:24	educational 58:2, 23 72:8
disruptive 36:8 37:7	10:15 61:19	Dutch 14:17, 21	Edward 52:2
39:21	doing 8:5, 20 10:21	duties 58:16 59:25	effect 48:21 54:2, 7
dissertation 20:13 45:1, 19	29:23 36:14	60:3	efforts 57:18 69:8
dissertations 31:1	44:23, 25	dysfunction 35:17, 19, 25	Eindorot 12:22, 24
distinct 65:25	45:3 61:12	dysfunctional 34:24	13:2, 6 14:4
distinction 66:3 78:16	70:9 82:14		70:19 91:7
distinguish 73:24 78:14	89:8, 12	E	either 32:11
distracting 26:6	90:3, 25		element 41:16
distressed 26:11, 24	dollars 35:4	E-I-N-D-O-R-O-T 12:24	Elijah 11:3
distressing 26:2	dominant 65:1	e-mail 26:4 48:10, 15 54:8 94:9	emancipation 77:5
division 57:18 59:9	donors 13:10 35:3	e-mailed 48:15	embezzle 93:2
60:2 69:8	dossier 46:23 56:13	earlier 11:21 25:1	employment 14:24 18:7
doctor 79:21	drafted 71:6	44:19 45:15	20:20
doctoral 30:25 31:18, 21, 23 32:11, 13	drawn 13:8	82:23	end 6:13 8:6, 16
doctorate 31:11	drink 68:13	early 6:21 40:3	14:18 26:18
doctors 82:16	Drive 5:8	57:25 58:8	35:8 38:20
doctrine 75:5	drop 88:15, 17, 18, 19, 23 89:4, 13, 17 90:2, 20, 22	63:15 77:19	41:22
document 56:15, 17	dropped 86:14, 15, 18 89:6, 24	easily 93:3	endeavors 22:2
	drops 90:11, 23	easy 67:22	endorse 76:9
	DSM 65:24	Ebbeler 42:15, 24	endorses 74:6
	Dubro 14:4, 8 15:6	43:11	endowed 35:9
		economic 82:8	
		editorials 71:9	

endowment 35:7,24 36:11	eventually 34:13	expect 55:8	facilities 68:15
Enforcement 26:1	everyone 63:22	expectation 78:4 85:12	fact 25:22 44:1,5 51:18 53:15 66:25 73:1 75:21 77:4 89:12
engage 68:7	evidence 43:23 54:2 56:8,12	expected 31:12	faction 36:2,5 40:16 41:5 46:1 48:6,13,19
engaged 42:16	evolving 23:13	experience 10:10 75:17 82:8 90:1, 10,19	factualized 33:25
English 19:5	exact 33:7	experienced 8:24	faculty 17:4,11 34:4,5,6 39:11 40:8 41:20 42:9, 11,14,25 43:6 44:15, 16 45:13 46:6 51:5 52:21,23 57:16 69:8
enhanced 80:7	exactly 15:15 19:17 62:15	experiment 83:9	fair 29:6 40:7 60:6 63:5
enjoy 75:11,13	exam 89:2	experimented 72:19	fairly 25:15 58:9 59:17
enrollment 25:10	examination 5:1 26:17 82:14	experimenting 74:15	falculy 42:3
ensued 40:5	examining 7:9	expertise 16:17	fall 6:18,25 16:23 24:16 25:11,16 26:3,10 27:19 28:12 30:5,6 31:14 41:25
ensure 81:3	examples 84:19	explain 89:5	fallen 51:4 52:14
enthusiastic 46:4	exams 23:21	explained 7:8 50:5 52:20	false 91:19
entirely 28:7 43:17	exclusively 22:12 58:4	explaining 27:12	familiar 5:18 90:24
ephebophilia 65:10	executive 72:14	explanation 51:20 52:23	
equal 38:12 63:19	exercise 80:10	explicit 77:17 81:19	
era 93:6	exercising 86:4	express 78:9 94:12	
Es 14:15 16:5	exert 71:23	extensively 22:10	
essentially 13:13 69:14 87:8	exhibit 36:22,24 37:13,15 46:22 71:21, 22 72:2	extent 44:8	
estate 17:17	exhibits 9:10 36:20 47:15	external 48:3,4 49:7	
European 79:3	exists 69:22		
evaluation 59:2		F	
Evelyn 14:10		Facebook 87:19,25 91:11	
events 40:5			

family 18:20 93:16, 21,24	filed 5:17,22 9:6 38:11	flyer 10:5 26:11 30:19 86:23 88:6	foundation 13:4,7,15,21 14:3,23 16:21,25 21:4 57:20, 22 58:12 59:5,21 60:3,9,10 61:6,10,12, 17,22,24 62:7,10,14 63:3 64:6 69:4,9,11 70:6,12 71:14 72:6, 15,17,24 73:22 75:21
family's 92:17	filing 5:20 9:8 54:17,21	flyers 86:8,13	
famous 69:17	filings 9:10 13:17, 21,22,25	focused 22:2 76:24	
far 8:5	filled 74:23	following 40:5	
fascinated 33:1	final 26:17 89:2	follows 4:24	
father 92:19,23,24 93:5,12	finally 8:20	force 37:7 86:1	
father's 93:9	financial 80:15	forget 24:2	
Faulkner 52:1	find 86:25 94:12	form 4:18,21 33:9,10,12, 13 37:9 38:7 39:5 40:10 47:8,11 49:23 50:3, 25 51:7,13 52:16,19 53:2 54:1, 12,14 56:6, 21,22 58:24 64:2,8 65:19 67:23 74:8 75:1,15,23 76:1,10,17, 20 77:6,23 78:12,18 79:12 80:6, 17 81:7,25 83:15,22 84:10,16 85:11,14,23 89:10,18,22, 25 90:8,17 93:10	founded 69:14
faulted 35:25	finding 25:21		founder 72:23 73:2
favor 35:7 36:14 38:15	finished 29:5,7 37:4 38:25		four 27:20 41:6, 18 45:25
favors 85:19	finishing 30:17		Francisco 18:21
federal 4:7,8 5:17 63:20	first 4:24 7:9 21:18,21 25:23 44:4 51:10,12 57:10 59:13 86:6		freedom 38:13,14 55:1 56:24
feel 17:9 72:15			freelance 14:25
feelings 40:14			freewill 80:10
fellowship 21:7	fit 34:22		frequently 73:16 84:12
felt 34:23,24	five 14:5 15:17 16:13,20 74:21		freshman 32:24,25
fewer 45:2			freshman- level 25:9
fiction 81:10,13	flexibility 23:22		Freud 75:8,9
field 64:24	Florida 79:5	formal 5:13 16:15 70:7,25	Freud's 75:5
figures 24:25	fluent 19:22 20:2	found 38:14 55:5 92:9	friendship 11:23,25
file 13:23 26:20 47:13 88:24	fluid 23:6,13		

fulfilment 61:16	German 19:21,23	22 76:19 77:8 84:23	greater 23:12
full 8:8 38:19 39:12	20:2	85:18	greatly 81:14
full-time 60:8	Germany 20:3 21:1,2, 8 48:8 79:2	good 8:5,7,20 9:1 25:21	Greco 24:23
fully 58:11	gestures 8:22	google 25:22	Greece 24:22
functioning 35:1	getting 86:18,20 89:11,14	gotcha 14:20	Greek 19:20,22,25 20:15 21:15, 17 22:2,6 23:15,16,21 25:3,7 31:19,22 32:6,18 33:2,3,5,8, 9,13 35:9 51:3,22 52:13
<hr/>			
G			
<hr/>			
G-U-L-I-Z-I-O 28:2	gift-giving 84:12	GPA 89:15	Greeks 10:2 29:2 84:11,14
gained 34:13	gifts 83:12 84:3, 4,17 85:2,9, 18,22,25 86:2	grade 86:17,20 87:2,6 88:13 89:14	Green 93:25 94:1
Galinsky 36:15 42:8	girl 65:5	grader 87:3	grew 18:13,16
gap 78:3	give 29:17 35:4 38:17 53:16 54:10 59:20 81:6 84:23 85:17,22	graduate 19:8,12 22:8 28:4 30:13, 16 32:6,12, 13 34:2 41:9 42:22 44:18, 22,23 45:4, 5,21 48:22 51:22 94:8	grievance 54:17,21
garbage 25:21	given 7:2 11:14 59:16	graduated 18:22 19:3	group 91:22,25
gave 47:17 56:17 86:16 89:3	giving 7:16,19 10:25 84:3,4 85:25	grandfather 92:21	grown 59:12 89:1
gay 12:9 21:18 22:16,19,25 23:2 58:4,6 62:18,19,24 63:4,8,10, 14,15,18,19, 23 64:4	GLAAD 62:19,23	grant 21:3 62:13	guardian 79:22
gay-related 21:21 22:15	glove 84:6,21,24	grantees 13:11	guess 13:17 84:5 89:19,20 90:9,13
gays 63:21	gods 24:23	granting 85:18	guessing 89:16 90:16
general 63:11	goes 34:21	great 55:18	guest 71:9
generalized 87:5	going 4:15 9:1 25:20 36:20 44:4 49:10 58:6 67:22 68:9 71:16,	great-uncle 70:2,3	Gulizio 27:22,24 28:3
generally 18:4		great-uncles' s 69:17	
generous 53:17			

guttural 8:22 60:20	Hercules 24:24	42:4	Iliad 25:3
guy 89:21	herd 40:19	hour 68:10	illegal 68:1,5 77:24
<hr/>	hero 24:24	hours 59:21	78:16,21
H <hr/>	high 18:22	house 6:17 25:24	79:11,14
half 21:9 34:16	high-quality 42:23	91:14,18	83:24
59:16	highly 38:8	HRC 62:20,21	illegalize 80:2
halfway 90:23	hire 41:25	Hubbard 4:23 5:4	immediate 10:16
handed 86:12 88:6	hired 21:15	42:4 48:12	immoral 76:4 78:6,
handing 36:23 86:8, 23	historical 65:11	53:8	11,17 79:1,
handles 70:16,20	history 16:19 47:6,	huge 47:17	2,5,11,22
happen 83:6	24 49:21	huh-uh 8:22	80:16,24
happened 77:19 82:15	50:23 75:7	human 33:1 62:22	81:22 84:25
hard 87:2	Holly 93:25 94:1	Humboldt 21:4	impeach 53:18
head 39:2 66:1	home 6:8 29:20	hundred 27:14	important 7:20 50:16
heading 61:7	73:15	hypo 85:9	82:10
healthy 72:21,25	Homer's 25:3	hypothetical 84:8 85:8	impression 48:12 49:6
hear 26:2 57:13	homosexual 22:3,15	<hr/>	76:8
heard 25:1 48:20,	23:15 32:14	I <hr/>	in-person 28:14
24 49:7	homosexuality 21:17 22:3	idea 59:20 89:6	inappropriate 67:21,24
66:10 91:14	33:9,13	identified 41:18 46:1	68:4 82:14
hebephilia 65:9	honest 43:18 44:7	identities 23:12	inarticulate 60:20
hegemonic 36:2,4 40:16	55:8,11	identity 22:18	incarcerated 63:10
41:5 46:1	honors 32:3 33:17	II 73:14 93:6	incident 6:16
held 18:12	hooks 82:22	III 72:6	incidental 84:20
hence 63:18	horrificed 66:25	Ilan 63:13	include 33:2
	hostel 40:1,8,15		included 28:9
	41:4,14,19		includes 23:17 62:11
			Including 64:11

income	28:24	involves	joined
17:16,23,24	insufficient	79:19	16:23
incorporated	87:7	involving	Jones
13:25 57:23	interaction	82:15	41:7
increase	87:13 94:1	isolated	journalist
38:17 47:18	interest	11:22	14:25 91:8
increasingly	18:2 22:21	issue	JR
21:17	interested	63:15,18	4:8,13,22
indeed	7:10 21:17	87:8	5:2 6:4
16:11 47:23	23:23 87:20	issues	17:13,15
independent	interesting	10:23 39:23	27:1,3 36:23
40:20	71:11	63:7,8,21	37:12 39:8
indicative	interests	64:6 76:25	40:12,21,23
37:2,6,15,19	21:13,14	Italy	43:9,11 47:9
individual	23:14 91:12	79:2	49:8,10,25
81:13	interfered		51:10,16
inflation	26:24	J	52:5,7,17,25
87:6	interferes		53:6,21,22
influence	26:8	Jake	54:3,13,19
82:7,10,11,13	international	48:23	55:3,5 56:9
influenced	58:22	James	57:1,4,6
92:17	interrogatori	14:4 15:6	59:6,8,10
information	es	14:7	64:11 66:20,
14:1	91:5	James'	22 68:3,20
informed	interviewed	14:7	69:3 71:22
58:11 68:8	44:1	January	74:10 75:3,
80:25 81:3	intro-level	6:6 24:13	19,24 76:14,
86:4	28:19	jarring	18 77:2,10,
initially	introduced	75:20	25 78:13,20
40:3	26:15	Jennifer	79:13,24
inquire	introducing	42:15,24	80:12,19
94:10	72:16	43:11	81:9 83:19
inquiring	introduction	Joann	84:13,19
71:13 77:3	29:1	27:22,24	85:4,12,16,
instances	introductory	job	20 86:3
89:13	25:8 73:21	8:5,21 11:8	89:16,20,23
instincts	investigate	15:6,8,19,21	90:4,12 91:1
75:6	55:6	20:21 34:20	93:15
Institute	involve	36:12 43:21,	judgment
63:13	25:2 80:8	24,25 44:1,5	9:9
institution	involved	52:2	judicial
34:20	10:23 28:5	jobs	77:18
instruction	70:5,7 83:8	46:25 47:2	July
29:18	involvement	Joe	5:6,12
instructional	61:6,9,16,21	5:23 68:12,	jurisdiction
	69:9	21	77:15 81:1
		John	82:1 83:17,
		30:8,10	25

jurisdictions	8:12 10:21	larger	leaves
68:2 77:24	17:11 22:17	59:17	34:19
79:14,25	24:2,25	largest	lecture
85:6	25:24 26:5,7	34:3	29:16
justice	33:8 35:3,10	Larry	lecturer
63:7,8 64:6	39:9,22	48:25 52:1	27:22
justification	40:14,25	late	lectures
46:16	42:19 48:4,	6:23 90:20	28:9 94:6
justify	23 51:14,16,	Latin	lectureship
79:8	17 52:7,12,	19:20,22,24	34:9
	17 53:10,16,	23:16,18,22	led
	22 54:17	52:22	42:21 91:19
K	56:9 57:6	law	left
	58:2,5 63:14	26:1 63:20,	51:5 52:4
K-A-H-A-N-E	66:11 68:14	24 65:21	legal
31:8	70:8,9	67:5 68:7	9:5,7 66:13
Kahane	71:10,18	77:16,18	78:10 81:8,
31:4	72:4,21 73:9	78:7,9 79:4,	10,12 82:1
Karl	75:8,16	7,23 80:2	85:6
36:15 42:8	79:11,21	laws	legends
Kathleen	80:19,24	78:22 79:8	24:24
33:18	82:12 84:18	81:1	legs
kept	87:12,14	lawsuit	68:13
49:2	88:2,7 89:17	5:17,20	Leoda
kid	90:4,7	42:16	57:6,8,14
83:10,11	91:12,20	lawyers	lesbian
kids	92:19 93:1,	91:2	62:24 63:10
75:11,13	20 94:12	lax	Leslie
76:3 83:6	knowledge	89:1 93:2	41:7
Kim	87:22	leaders	letters
48:25 52:1	known	36:6,19	58:13 59:2
kind	47:7,25	leadership	letting
29:21 37:10	49:22 50:24	35:15 36:5,	89:1
80:9 82:10,	Korea	10 38:9	level
17 87:1	93:6	45:23	26:19 31:23,
kinds		leading	24 45:2 52:3
79:18 80:3	L	35:17	81:2
King	labor	learn	libertarian
5:4	57:18 59:9	10:2 25:20	93:14
Kitter	lapsed	29:19	lieutenant
33:18	12:18	learned	92:12
Klein	large	23:8 91:22	life
75:8	27:13 29:16	learning	24:11 25:1
knew	30:2 86:9	10:10	73:6
15:16 42:19	largely	leave	light
49:4 90:19	36:16 38:15	7:1 24:15	25:18 40:4
know	42:17 58:1,4		

likelihood	63:22 71:23	60:25 63:21	material
80:8	76:25	68:12 74:22	26:18 33:1,2
likes	looked	76:11,19	materials
73:5	87:16,19,24	88:3	28:8 58:2
line	88:1	makes	73:21
34:6,8 41:23	looking	13:17	maturity
lines	59:10 76:21	making	67:15
34:4,5,11,	lose	22:17	mean
16,25	71:25	male	6:3 17:21
linguistic	lot	10:1 67:10	23:7,20
19:19	9:1 23:8	80:13	24:25 25:12
listed	28:8 29:23	man	26:6 28:20
58:25 61:18	60:1 63:16	23:9 66:12	31:15 32:8
listen	64:1 68:5	67:9,17,20	35:6,23
50:16,22	83:23 87:3	82:22 83:10	36:4,9,10,14
literary	lower	85:8 93:1,7	40:16,18
19:18 25:2	80:1 89:15	mandatory	45:18,25
literature		48:4	51:25 58:15
19:16 23:17	M	manipulation	63:11 64:15,
51:22 52:22		80:9 86:1	16 67:13
little	M-I-G-N-A-N-	Manual	71:8 72:12
69:7	E-L-L-I	64:20	73:4 75:7,
live	31:6	manufacture	16,17 78:1
17:21 21:2	Mackey	38:10	82:16 90:15
78:2	48:23	mark	92:9 94:6
lived	made	36:20	means
5:10,21 6:5,	37:16 39:25	marked	88:21
20 18:20	41:24 44:1	36:22,24	mechanically
20:3 21:1	47:16 53:5,	71:21	34:18
living	16 56:8,15	market	media
6:2,18	85:17	20:21	15:22 88:1
load	main	marriage	93:22
28:18,20	58:3	63:19	medical
local	mainstream	married	64:22,23
11:7,8	62:19 63:5,	11:4 24:4	79:21 82:11
long	17 64:2	master's	meet
5:10 6:20	major	19:14,15	7:7 12:8
11:17 15:14	24:21 32:24	32:22	45:8,10 46:9
16:12,20	33:4	masters	48:9
41:8 74:23	majority	32:9 45:19	meeting
76:2 81:24	28:15 46:8	match	12:9
82:1 84:7	65:22 66:9	36:13	meetings
86:1,3	68:21	matched	10:18 28:14
longer	majors	52:2	94:7
6:11 88:9	45:7 46:7,17	Mateo	meets
look	make	18:20	44:22,25
25:20 36:25	24:3 51:1		45:4,7 46:6

83:10	middle	modern	27:6,19
Melanie	14:18	23:25 77:22	28:12,13
75:8	Mignanelli	modified	29:8
member	31:4	28:24	myths
12:13,17	military	molest	24:21
16:22 17:3	93:5	66:15	
42:25 44:3	million	molestation	<hr/> N <hr/>
45:10,13	35:2	67:14 73:11	
46:6 52:21	millions	molested	name
57:16 86:13	35:4	73:10	5:3 9:25
93:16	mind	moment	11:2 12:10
members	77:3 83:14	36:25	14:6,7,12,17
12:12 37:21	minds	money	25:22 31:5
39:10 40:8	41:2 71:13	17:10,12	32:21 69:16,
41:20 48:19	72:16	62:13 70:10	17
membership	minimal	93:3	named
12:15,18	59:17	Montreal	38:17 55:12
memo	Minnesota	16:4	91:4
38:16	20:25	moral	names
memorandum	minor	78:22 81:2	31:2
46:22	24:8 58:9	93:1	namesake
Memphis	79:20 81:22	morality	72:23 73:3
73:15	84:18	78:23 79:16	75:20,22
men	minority	93:7	77:4
73:25	35:9	morals	namesake's
menstruated	minors	78:25	73:24
65:5	76:9	Morning	namesakes
mentality	minutes	25:25	73:23
40:19	68:10	mother	naming
mentioned	missed	26:4	13:25
13:14 21:1	26:15	mother's	narrow
60:14 78:8	mission	92:23	67:7
80:1,5 91:16	26:25	motion	nation
92:4	mistreated	9:8,9	34:2
met	40:17	moved	national
86:6 93:15	misunderstand	41:24	19:19 58:22,
94:2,4	ing	movement	24 61:7,13
Meyer	68:6	63:15	natural
63:13	misuse	moving	68:7
mi	57:2	42:2	nature
68:14	mob	multiple	13:5 33:20
Michael	6:17	19:18	62:10 63:18
31:4,14	mode	mythologies	83:13 84:7,
Michael's	29:18	25:3	17
31:5	model	mythology	need
mid-term	88:2	24:16,20	4:6 8:23
88:14 89:11		25:7,11	17:9,12

22:21 50:21	number	obviously	18:16
60:19,25	17:17 71:8	40:17	olds
68:11,17	79:3	occurred	66:17 67:2
72:15		80:20	once
needed	o	occurs	11:9 48:14
90:18		81:22	71:4 93:1
negative	objection	October	one
39:18 48:24	4:21 17:13	88:14	9:12,19,23
49:5	27:1 37:9	Odes	10:4 14:16,
neglected	38:7 39:5	20:14	18 17:20
62:19	40:10,21	offenses	26:4,10
neighborhood	43:9 47:8,11	64:9 65:20	28:19 29:10,
74:4	49:8,23	offer	11 30:1,10,
neutral	50:3,25	34:20 43:21,	11 31:2 34:1
39:10	51:7,13	24,25 44:1	36:14 38:21
never	52:5,16,19	52:2	41:14,23,24
24:4 45:20	53:2,21	offers	42:1,24 43:5
46:19 48:1	54:1,12,14	36:12,13	44:2,4 47:15
49:5 55:12,	55:3 56:6,21	office	48:2 51:19,
14,20,22	57:1,4 59:6	26:13	21 52:11,21
56:15 59:18	64:8 65:19	officer	59:4,23,25
66:10 70:7	66:20 67:23	93:5	64:4,5 68:7
75:17 86:10	74:8 75:1,	okay	73:4,23
93:4 94:2,4,	15,23 76:1,	6:1 8:9,13,	74:13 76:15,
5,9	10,17,20	23 11:24	25 83:10
news	77:6,23	12:6,10 14:6	87:4,16
15:10,11	78:12,18	15:4 18:4	91:7,11,16
25:25	79:12 80:6,	20:4 27:17,	92:9
nonjudgmental	17 81:7,25	18 28:3	one-year
74:13,14	83:15,22	29:6,13 36:6	18:9
nonresponsive	84:10,16	37:19 41:1,3	ones
17:14 27:2	85:11,14,23	42:24 43:18	19:19 41:3
40:22 43:10	87:2 89:10,	46:10 47:24,	ongoing
49:9 52:6	18,22,25	25 50:18	85:1
53:21 55:4	90:8,17	51:2,16	online
57:5 59:7	93:10	53:6,14 54:3	11:15 12:9
66:21	objectionable	57:24 60:6	25:20 28:7,
normal	84:25	62:14 64:14	8,16,25
60:24	objections	68:9 69:15,	29:15,17
northeast	4:17,18,20,	23 70:4	open
73:16	21	74:2,5 76:14	37:14 48:15
Nova	obligated	79:15 80:19	54:15
16:10	61:11	83:20 84:7,	operative
November	obligation	11,15 85:4,	92:11
30:19	61:3,5,9,16	7,22 86:6	opinion
nowadays	80:25 81:2	92:22	55:17 56:11
23:5	obligations	Oklahoma	opportunity
	60:11,13		

29:19 38:12	17:1	Paula	67:14
54:23	pains	41:10	perceive
opposed	7:17	pay	23:10 41:3
8:21 34:8	painting	12:13	perceived
42:18 52:22	84:12	payment	22:21
opposing	Palaima	12:14	perceiving
43:25	43:5 44:8	pedagogical	39:19 78:22
oral	paragraph	26:25	percent
84:24	47:20 49:12,	pederastic	90:6
organization	17,19	33:20	percentage
63:17 76:16	paraphrasing	pederasty	59:18,19,20,
organizations	45:24	33:8,14	25
58:21 61:13	Park	65:11,24	perception
62:19 63:5	5:8	66:10 77:13,	23:10
64:3	part	21 78:6,25	perceptions
orientation	13:21 23:7	80:4,24	23:7
23:6,11	40:4 46:22	81:21	Percy
original	47:12,16	pedophile	13:4,14,20
9:8	53:1 54:17	73:19 74:24	14:3,23 15:2
originally	56:12,14	75:4	16:21,25
18:19 32:23	58:15 59:14,	pedophiles	61:10,17,22,
outlets	15 61:2,5,8,	64:7,11	24 62:7,9,14
15:11	21 62:1,9	pedophilia	63:3 64:6
outlining	72:20 80:11	26:3 64:10,	69:4,9,10,
56:17	81:20 85:1	18 65:25	16,24 70:1,
outpost	part-time	66:14,23	4,5,11 71:13
19:7	16:14	67:2,4,11,14	72:6,10,15,
outreach	particular	77:11	24 73:9,23
58:5	39:24	penalty	74:19 75:21
outside	parties	7:17	Percys
36:12 43:21	81:20	people	69:19
52:2	partly	35:17 36:2	Perfect
overly	88:3	41:6,20 44:7	4:22
74:23	partner	46:1 47:4	perform
owner	11:1 80:11	49:3 51:21,	61:23
93:4	partners	25 56:2	performance
	73:6	63:10,12	26:9,20
	parts	64:12,13,24	performs
	75:12,14	66:2,17,23,	15:4
	pass	25 67:3 68:6	period
page	23:21	71:8,9 72:13	6:3,5 10:16
47:5 87:19,	passed	78:4 85:25	11:19 19:10
25 88:3	26:12	88:1 89:13	periods
91:11	past	91:2,4,6,13,	23:25
pages	77:4	17 92:3	perjury
47:14	patiently	people's	7:17
paid	8:6	40:13 41:2	

Perlman 41:10,12 43:6	poet 20:15	44:9 59:3 69:8 79:20 81:21 82:8	preteen 65:15
perm 40:4	poetry 21:15 22:6 23:15 51:3 52:13	positions 34:13 58:19	pretend 83:4
Perseus 24:24	point 19:20,25 27:9 42:1 45:2 55:16 56:7,16 65:23	positive 59:2	pretty 66:7 72:4
persistent 65:1	pointed 52:3	possibility 80:7	previous 33:16 60:7,8 77:7 90:10
person 11:16 28:17 43:16,19 51:21 82:14 83:16 88:4	Polar 20:14	possibly 46:24	previously 51:20
person's 80:21	policies 36:10	post-tenure 39:17,18 56:14,16 57:2	primarily 70:16
personal 22:18	policy 28:15	postpuberty 65:9	primary 63:18
petition 88:24	policy- related 39:23	power 81:18	Princeton 48:2,21,23 49:2,3,4
Ph.d. 20:12 49:2	political 87:18 92:10	praised 58:13	principle 68:7
phenomenon 65:13	politically 93:12	predominant 33:9,12	PRINGLE 4:8,13,22 5:2 6:4 17:13,15 27:1,3 36:23 37:12 39:8 40:12,21,23 43:9,11 47:9 49:8,10,25 51:10,16 52:5,7,17,25 53:6,21,22 54:3,13,19 55:3,5 56:9 57:1,4,6 59:6,8,10 64:11 66:20, 22 68:3,20 69:3 71:22 74:10 75:3, 19,24 76:14, 18 77:2,10, 25 78:13,20 79:13,24 80:12,19 81:9 83:19 84:13,19 85:4,12,16,
Phoenix 29:21	politics 32:25 41:13 87:15,21 92:17,18 93:8	prematurely 38:21	
phone 68:12	poor 26:20	prepare 9:4	
photographs 88:3	poorly 26:16 42:21 90:25	prepschool 73:16	
phrase 74:25	popular 87:5	prepubescent 65:3,14 66:15,24	
Pindar 20:15	population 63:11 66:6, 10	present 40:2 41:7	
place 75:7	portion 9:12,19,22	presented 38:9 46:22 54:6 55:12	
planning 32:23 44:24	position 18:9,11 34:21 35:16	president 13:3 14:22 26:5 69:10, 13 70:14,16, 20,21 72:25 73:22	
playing 75:11,13		presume 6:8 8:2	
please 4:3 5:3 47:21			
plenty 62:4,8			
poems 33:19			

20 86:3	profession	Proper	publication
89:16,20,23	47:7,25	10:10	30:19 65:24
90:4,12 91:1	49:22 50:14,	properties	publish
93:15	20,24 58:20	17:18,23	71:11
prior	professional	property	published
15:21 22:8,	34:16 58:21	6:11	9:23 39:19
9,24 26:19	professor	proposition	94:13
prisoners	8:24 15:22	73:17	punished
58:2,4,5	16:2,5,6,7	prose	79:23 80:4
63:14	20:18,22,24	23:17	83:18
privacy	25:21 26:2	prospect	pure
13:10	49:1 53:20	35:3	52:25
private	54:19 55:18	prospective	purely
75:12,14	69:3 71:24	53:6,11,23	81:8 89:9
privileged	87:1,5	54:9 55:13	purpose
7:14	professor's	56:2	62:17 71:12
privileges	87:9	prostitution	78:9
38:19 39:13	professorial	83:24 84:1	pursue
pro	34:8,11	proudly	39:14
84:23 85:13,	professors	77:4	put
15	58:16	provided	10:12 76:7
pro-pedophile	professorship	55:17,23	
76:16	38:18	56:12	
probabilities	program	provider	Q
90:10	30:16 42:22,	82:11	qualifiers
probably	23 48:22	providing	76:5
9:3 16:13	58:1	58:1	quality
18:24 42:5	programs	provisions	87:11
60:4 66:11	34:2 51:4,22	80:2	question
71:4 94:6	52:14	proviso	7:23 8:1,6,
problems	progress	78:15	8,16 27:4,5,
48:7 63:24	31:15,16	Psychiatric	7 40:24
procedure	projects	64:21	49:14,16
4:16	62:12	psychiatry	50:12,13,15,
proceed	prominent	64:25	16,17,18,22
4:13	87:18 92:10	psychological	51:6 53:3,10
process	promise	64:23	57:21 59:8
56:14 57:3	80:15	psychologist	60:2 77:8
70:25	promote	75:8	78:10,11
proclaiming	62:18	psychology	questions
77:5	promotes	64:25 65:8	5:24 7:21
prodigies	63:4	75:10	43:20 56:5
46:2,4	prompted	puberty	94:11
productive	22:14	23:3	quickly
36:12	prongs	public	94:15
profess	61:1	13:21,22	quid
16:8			84:23 85:13,

15	reason	48:15 54:16	render
quiet	44:10 47:17	reduced	80:2
8:13	52:12 72:20	34:16	renewed
quit	86:16 89:3,	referring	34:25
88:21	5,13,24	9:7 41:6	rental
quite	reasonable	refers	17:17,23
23:17 85:2	71:10	44:14 64:25	rented
quo	reasons	refuse	6:12
84:23 85:13,	46:3,19,20,	35:6	repeat
15	24 47:1 87:4	refused	8:17
quoted	reassigned	35:2 36:13	report
10:5,9,11	34:25	refusing	54:8
	recall	35:24 36:11	reporter
	10:15 33:6,7	refuted	4:3,5 8:8
R	47:2	47:15	15:9 94:14
	receive	regard	reports
R-O-T	19:12 55:8	23:5 63:6	13:17 59:1
13:1	received	85:21	represent
raises	21:16 22:4	register	83:3
17:9	26:20 54:15	83:1	representativ
Randy	receiving	rekindled	e
54:4	22:9,24	11:22	61:24
range	43:24	relations	Republican
76:25	recent	67:3 80:13	87:18,20
rape	16:22 51:4	relationship	reputation
81:15	52:14	67:5,24 68:1	26:23 37:19,
rapid	recently	80:8 81:18	21 38:5
31:17	42:20 57:13	82:3 85:1	39:3,7,8
rate	58:7	relationships	50:14,19
63:11	reception	67:1 80:3	request
reached	23:24	82:17	37:14 48:15
4:14	recess	relative	54:16
read	68:25 94:18	14:1	required
20:1 41:2	recognition	relevant	45:9
49:11 71:4	23:12	22:18,20	research
74:24 75:4	recognized	61:20	21:3 58:24
77:8	61:14	remained	63:25 77:1
read-on	recognizes	40:1	91:8
4:7,9	61:14	remember	reserving
reading	recommending	27:3 40:23	4:17
72:9	82:12	48:23 54:6	reside
real	record	57:8 59:8	5:14
17:17 43:20	4:1,6 60:25	60:19,20	resided
realize	68:24 69:2	remotely	6:24
76:23	94:15,16	11:16	residence
reallocate	records	removed	5:13 17:20
34:21	13:22 37:14	41:12	81:1

residing 6:13	retire 41:11	14 15:1,18 16:7 21:6	rumors 91:19
respect 53:20 82:13 90:5	retired 15:7,8,14, 16,20 16:6, 12 42:8	23:4 25:10 29:9,22,23 32:5 34:15 37:12,15,23	run 18:5 46:17, 18 47:3
respectable 63:22	57:11	41:25 42:5 45:15 46:8, 15 49:14	rupture 11:20
respond 54:24	retirement 15:21 16:15 34:20	50:8 56:20 60:4,13,22 61:5 62:2 63:3 66:8	<hr/> S <hr/>
responded 54:20 56:20, 22	retiring 41:10,22 42:1 43:6 44:11	69:11,18,21, 23 70:11 71:18 72:5 73:21 77:25 78:24 81:9 83:3,5 91:10	Sacramento 11:12,14
response 8:7,9 9:9 38:23 47:14 51:9 55:8, 11,18 56:7 59:12 77:7	review 9:12,15,22 10:3,6 39:17,18 47:20 48:4, 6,8 49:12,13 56:14,16 57:3 58:13 61:19 70:24 76:22 93:22	92:14,20 93:11,25 94:3	safety 92:1
responses 9:16	reviewed 9:5,18,19 49:17,18 71:2 72:3	rights 33:1 62:18, 22 63:4,9, 15,19 64:4	salary 17:7 38:17 43:24 47:17
responsibile 36:16	reviewer 49:7	Robert 48:2 50:4	San 18:20,21
responsibilit y 35:13,16,22 38:13,14 55:2 56:24 70:14	reviewers 48:3,9	role 44:13,16 46:6	Santa 19:2
responsible 24:9 70:22	reviewing 10:15 74:5	Roman 24:23	Sarah 91:3,17 92:2 93:21
rest 76:22	revise 33:16	romantic 11:24 12:1	Sarah's 93:16
restore 38:18 39:3,6	rid 48:12	Rome 24:22	Saratoga 20:22
restored 47:18	Riggsby 41:8	room 68:18	saying 83:7 85:20
restricted 12:15	right 5:14,23 6:4, 20 7:16 8:1, 11,15,20 9:15 10:18 11:17 12:2, 14,20 14:9,	roughly 60:10	says 49:15 51:2 53:19 72:9, 18,20 74:16, 19,20
restroom 68:12,23		royalties 17:25 18:4	scandals 82:15
result 26:14 35:6 39:11		rule 4:11	schedule 60:9
resumption 21:7		rules 4:16,20	scholarly 62:10 64:19
retaliated 40:18			scholarship 58:16 60:1, 15 61:2,22 62:6,8 65:11,12

school	sense	84:24 85:10,	38:7 39:5
18:22	22:18 40:19	24	40:10 47:8,
science	78:25 79:16	sexologist	11 49:23
32:24	81:8 92:15	67:18	50:3,25
scientist	sentence	sexologists	51:7,13
33:4	51:2	67:8	52:16,19
Scotia	separate	sexology	53:2 54:1,
16:10	85:2	66:2,8	12,14 56:6,
second	September	sexual	21 64:8
30:11	5:23	10:1 23:5,	65:19 67:23
secretary	seriously	10,12 65:14	68:22 74:8
13:24 57:10	37:7	67:3,15	75:1,15,23
section	serve	72:21,25	76:1,10,17,
25:14,15,17	46:13,25	73:6,24	20 77:6,23
27:8,13,14	47:2 61:11	74:7,21 75:6	78:12,18
28:8 29:10,	served	77:5 79:6	79:12 80:6,
11	22:20 33:21	80:13 85:18	17 81:7,25
sections	45:16,20	sexuality	83:15,22
25:12,13	93:6	31:19,22	84:10,16
27:18 28:7	service	32:7,18,25	85:11,14,23
30:2	58:17,19,20,	33:6,19	89:10,18,22,
seduced	22,25 60:15	66:19	25 90:8,17
73:12	61:2,5,7,8,	sexually	93:10
see	12,14,16	12:1 72:9,11	sick
7:2 11:20	services	73:1,10	24:15
23:8 34:22	38:12	74:19,25	side
35:12 37:13	serving	75:18,22	15:6
43:7 55:10,	46:16 58:18,	share	sides
11 57:12	20	35:2,9	39:21
73:16 86:10	set	shared	Sightly
Seeking	23:6 58:9	25:19	18:6
82:24,25	setting	shopping	Sigmund
seekingarrang	67:7	90:22	75:5
ement.com.	settlement	show	sign
12:11	39:25 53:17	71:16 84:12	89:12
semester	several	showed	signal
6:18,24,25	17:8 25:12,	88:2	63:14
21:8 28:12,	13 35:7	showering	signature
21,23 29:4,	36:11 51:20	85:9	32:25
5,7 31:14	52:22	shutdown	significant
44:23,24	severely	28:6	59:15
90:21,24	80:4	shy	similar
send	sex	42:3 63:23	12:17
26:4 71:9	64:9 65:20	Sibley	simple
senior	67:9,19	4:10,14,19	27:7
31:25 32:17	73:18 76:9	5:24 7:8,10	simply
33:5,17 52:3	81:23 83:13	10:19 37:9	40:15

simulationist	52:15	spelling	states
63:17	solely	14:21	34:3 65:22
sinecure	48:17 49:6	spend	78:2
46:11	sort	59:21 60:1	Statesman
single	32:13 63:8	spoken	25:25
47:15	71:9 80:15	94:5	Statistical
sins	82:2 85:21	sponsor	64:20
78:23	sorts	77:1	status
sir	13:20	sports	28:25
5:3 50:15	sources	83:12 84:6	stay
site	17:15	spring	60:23
12:9,12	Southern	6:25 21:8	step
82:23 83:2	43:22	24:15,17,18	53:18
sites	speak	25:16 29:5,7	steps
12:17 83:11	19:24 40:13	Springs	38:16
Skidmore	speaking	20:23	Steve
20:22	4:17,21	staff	41:6 46:21
slightly	55:15,19	44:15 45:10,	48:18 51:1
49:11	special	14	stick
slip	80:9	stand	71:24
60:24	specialist	62:23	sticker
sliver	21:15 51:5,	standard	71:25
66:7 67:8	19 52:15	66:13	stopped
sloppy	specialize	standards	69:5
66:18	66:2	87:8,9	strategist
small	specialized	start	92:11
7:6 25:15,17	19:20 51:25	8:7 18:13	strategy
28:16 29:10,	75:9	32:12 64:4	63:16
11 30:23	specializing	started	stream
57:25 59:13,	51:21	31:15 40:6	34:7
24 66:7	specific	85:2 91:16,	street
91:25	61:11 86:16	17,19	66:12,23
smaller	specifically	starting	67:9,18
27:12 60:9	59:23 63:6	21:16,25	stretch
smokescreen	76:24 78:8	27:9	68:13
36:18	speculate	state	strict
social	52:20 75:2	4:20 5:3	93:7
87:25 93:22	speculating	13:23,24	strong
society	41:17	43:4 65:22	51:3 52:14
66:7	speculation	stated	strongly
society's	53:1,3 89:7,	87:20	35:10
23:10	9	statement	Structure
soldiers	spell	33:16 47:3,5	20:14
73:13,17	12:23 28:1	48:2 52:8	struggles
sole	31:5	53:5	77:19
48:1,12	spelled	statements	student
49:24 51:5	14:6,15	10:4 25:18	

11:7,11 12:4	subjects	31:3,15	talking
19:8 25:17	16:17 31:19	47:21 62:5	6:15 8:12
26:10 50:6	78:22	88:4	59:23 66:19
87:9,14 88:9	submit	surrounding	69:4
90:20 94:8	39:18	43:21	talks
student's	submitted	survey	72:8
26:4 31:18	56:13	25:5,7	Tape
32:21	subsequent	surveys	69:2
students	39:16 48:10	24:21	task
22:19 25:1,	56:13	Susan	15:4
16,20 26:2,	suburbs	45:11	taught
7,13,24 27:7	18:21	swear	12:6 21:18,
28:5 29:11,	successor	4:3,6	19,21,24
18 30:13,25	40:2	sworn	23:16,17
31:9,21	suggest	4:12,24	24:14,16
32:16 44:23,	43:23 64:1	7:17,20	27:18,21
25 45:1,3,4	suggesting	sympathetic	28:11
46:18 47:6,	64:17	43:7 44:9	tavern
24 48:20	suggestion	synchronous	11:9
49:21 50:24	76:13,15	28:9	tax
53:7,11,23	summary	system	13:22
54:9 55:7,13	9:8	77:18	teach
56:3 82:18	summer		16:16 25:6,
86:10,25	30:17 31:13	T	12,17 28:22
87:10 89:1	Summers		29:6 30:23
90:2,11	45:11	take	59:22,24
92:1,16	super	5:16 8:8	teacher
studied	32:12	11:8 29:19	26:8 79:20
22:7,10	supervise	33:3 35:13,	90:1
studies	30:24 57:14	22 36:25	teachers
15:22 20:5	supervised	68:11,16,18,	82:18
22:15 23:15	31:21,25	21,22 90:11	teaches
32:14 63:12	32:6,9,11,	taken	25:13
study	13,17	24:13 25:25	teaching
19:18 23:24	supervising	39:21 68:25	6:18 16:14,
61:22 64:13	62:12	90:20 94:18	18 22:22
66:8	supervision	talk	27:6 28:19
study's	31:1 81:18	10:14 24:22,	29:3,25
41:9	82:18	23 25:2	30:1,3,6,18,
studying	supervisory	32:16 43:3	21 58:16
23:7	79:19 82:2	54:18 64:3	59:17 60:9,
su	supportive	68:12 70:8	14 61:2
68:14	22:22 63:14	76:12 86:6	87:16 90:14,
subject	Supreme	talked	15 92:7
7:17 23:8	63:21	82:23 92:2	teen
subjective	sure	93:18	82:16
40:13	15:15 24:3		

tell	text	74:5,18,24	19,25 60:1
7:24 18:7	19:18	75:3 76:4	68:11 86:12
32:20 42:13	Thank	77:14 78:4,6	87:20 88:9
51:10,12	8:14 72:2	79:7,10,11	times
68:9,10 91:6	thanks	81:1 82:10,	63:11
telling	63:20	17 83:18	tiny
54:23 79:10	theater	84:15,25	18:2
ten	83:12 84:5,	85:15,19,24	tired
34:2 48:5	22	88:16 89:11	11:21
ten-minute	theme	thinking	title
68:22	21:18,22	48:16	33:7
tend	22:6	third	today
62:18	themes	42:3 69:25	5:16 7:10
tended	22:3,15	70:1	9:2 23:11
63:23	theocratist	Thomas	26:1 36:20
tenure	33:20	4:23 5:4	78:6
21:16 22:4,	therapist	14:5,9 15:18	token
9,24 34:7	79:20	16:22 94:3	8:15
39:22 42:19	thesis	thought	told
49:2 52:1	31:18,22,25	25:16 39:1	7:11 10:24
tenure-screen	32:2,4,6,9,	44:4 45:16	17:9 27:10
18:11	13,17 33:5,	49:10 50:19	40:25 47:18
tenured	17 45:19	59:18 83:9	48:13,18
34:8	thing	thousand	72:12 73:12
term	82:17	18:6	87:17 88:1
38:20 44:14	things	three	91:17 93:1,
64:19 65:8,9	13:20 23:13	10:5,7,8,11,	22
67:1,12,17	35:1 60:14	12 26:16	Tom
terms	62:11 71:7	27:20 30:25	42:4 43:5
55:15,19	82:8 83:12	31:10 48:3	48:12 53:8
66:3,5 82:12	84:7 94:13	58:15 59:14	tons
test	think	60:14 61:1	35:4
77:18	5:22 9:14	63:11	top
testified	11:19 12:11	Thymos	34:2 35:19
4:24 7:5	15:15 16:13,	9:23	66:1
testimony	14,15,23	tickets	topics
7:17,20	17:6 23:11	83:12 84:6,	32:10
80:22	27:9 28:4	22	Toronto
testing	30:10 32:9	tight	15:13
78:9	34:12 35:5,	20:21	totality
Texas	19 39:10,17	time	62:3
4:16 17:4	41:13,16	4:2 8:3,11	touch
21:10,14,19,	42:5,20	19:10 30:3	49:2
25 23:15	43:20 44:10	34:10,12,19	tough
57:17 59:22	56:7 64:16	35:5 41:8,14	87:3
67:5 87:6	66:15 67:13	48:8 52:9	tout
	70:3 71:10	54:21 56:11	61:15
		59:14,15,18,	

touts 72:25 75:21	turned 44:4	undergraduate 32:2,3 44:17 45:7,21	unnecessary 74:23
track 34:7	two 6:3,6 14:15	undergraduate s 45:9 46:5,7 48:22	unwilling 83:7
tradition 23:25	16:5 26:16	underserved 63:4	upbringing 92:16
traditional 93:13	28:20 30:8	understand 7:11,14,16, 19,20 27:17 50:17 66:2,4 78:13,16 81:5	upheld 55:2 56:25
traditions 19:19	34:22 41:22	understanding 4:15 28:5 44:9 67:14, 16 74:3 78:24 85:21	upright 43:15
tragedies 25:4	42:1 43:5	understood 8:3 14:2,11 34:10 77:21	USC 43:25
train 73:17	44:2 49:3	United 34:3	usual 28:20
trained 23:20	52:4 59:14	universities 29:23 58:18	utterances 8:22 60:21
training 22:17	63:1 67:2	university 15:23 16:9 17:4 19:3,8 20:6,7,24 21:10,14,19, 24 22:19 23:14 26:6, 25 28:6 29:14,21 30:24 32:22 34:21 35:4 37:8 42:16 43:22 57:16 58:11 59:4, 22 60:4,11, 14 61:3,9,13 87:6 89:1	
transcript 89:14	typical 28:18 51:22	unlawful 80:3	
traveling 11:1 73:15	<hr/> U <hr/>		<hr/> V <hr/>
trip 11:9	U.T. 6:19 17:7, 16,24 18:7, 8,11 20:16 33:21 36:1 57:20 90:15		V-E-R-S-T-R- A-E-T-E 14:13
troubled 75:24	ubiquitously 22:6		varies 65:21
true 22:12 30:20 39:15 51:6, 12 52:8 53:8 54:5 55:7 61:8,12,17, 25 62:7 65:18	UCLA 63:13		various 9:10 24:23 25:3,24 46:3 82:12 91:13
trust 26:7	uh-huh 8:22 18:15 27:25 29:22 32:19 36:21 43:1 60:16, 23 65:16 69:6 72:7 82:21		vary 81:14
trusted 48:19 93:5	ultimately 38:18 47:17 53:15 70:21		Vase 84:12
truthful 43:23	uncle 70:2		vastly 38:17
try 36:2 38:10 39:18 60:23	unclear 7:24		verbal 81:19
trying 29:17	uncooperative 40:6		version 29:1,15
turn 22:14	underaged 65:17		Verstraete 14:13 16:7
			versus 57:20 59:22
			vice 13:3 14:22 70:16,20

Victoria		webmaster	Wisconsin
5:8		15:3 76:12	32:23
video	W	website	witness
25:23		70:12,15,17,	4:4,6,12
VIDEOGRAPHER	W-A-U-G-H	22 71:3,12,	5:22 6:1
4:1 68:24	14:10	17,18,23	wondering
69:1 94:16	waiting	72:16 76:21,	77:3
	8:6	22 77:3	wooing
Videotape	waive	weeks	84:4
4:3	4:8,10	6:3,6 26:16	woos
views	waived	well-	83:11
94:10	4:11	documented	word
violate	waiving	63:12	66:10,14
79:16	4:7	well-known	words
violating	waking	24:25	4:17 8:21,25
79:8	59:21	Wells	10:5,7,8,11,
violation	Walnut	11:3,6,10,17	12 34:7
77:16 78:7,	18:20,23	12:2,8,21	36:14
21	want	went	work
violent	31:2 35:12	10:22 19:2	16:25 22:8
6:17 81:15	40:15,17	26:12 32:22	29:13 55:7,
virtual	45:6,8 55:7,	48:22	21 58:12,24
28:13 29:11	21 57:19	White	59:4 62:9
virtue	64:3 68:11,	41:7 46:21	83:9 87:4
26:19	15,21 71:23	47:25 48:18	worked
Viscrat	74:22 79:11	51:1	50:6
14:5	wanted	White's	working
visit	10:6 28:25	53:16	11:8 53:8,
49:7	49:12 93:2	widely	12,24 54:9
visited	War	23:16 47:6,	56:4 57:20
91:11	73:14 93:6	25 49:21	58:23
visiting	wards	50:24 64:24	workplace
20:18,24	24:8	William	63:20
53:7,11 56:3	warned	13:3,14,20	works
77:3	35:23	14:3,23 15:2	25:2
voice	water	16:21,25	world
53:7	68:13	61:10,17,21,	54:10 73:14
voiced	Waugh	24 62:7,9,14	77:22 93:6
53:9,12,23	14:5,9,10	63:3 64:5	write
54:9 56:3	15:18 16:3,	69:4,9,10,	62:8,12
von	22	18,23 70:1,	writing
21:3	way	4,11 71:13	31:22
voting	22:17 25:6	72:5,10,15,	written
38:19 39:12	29:19 52:11	23,24 73:9	22:10 33:17
	64:15 74:13	75:21	52:9 58:14
	ways	Williams	71:7,8
	42:15 64:4	63:13	

May 25, 2021

30

wrong 80:21 82:14
 64:16 77:15 85:25 92:16
 82:19 83:14, **younger**
 18 85:19,25 17:10 23:9
wrote 69:21 80:11
 46:21 83:6,16,17

Y

Z

y'all **Z-A-R-A-M-I-**
 11:4 55:19 **A-N**
Yale 30:12
 20:6,7,11 **Zaramian**
yeah 30:9,12 31:1
 4:10 14:10 92:9
 27:11 32:3 **Zoey**
 41:18 42:13 94:3
 46:8 59:10 **Zoom**
 63:1 68:22 28:10
 71:20 83:4
 84:4 92:6,13
year
 5:23 11:21
 18:5 21:9
 28:11 32:24
 34:4 41:23
 59:16 66:17
 67:2 73:19
 74:14,15,20
 84:5 86:3
years
 12:18 15:17
 16:13 17:8
 22:7,8 36:16
 38:6 39:19
 48:6 51:4
 52:4,15
 54:16 57:25
 58:8,10
 59:13,14
 60:7,8 82:7
 87:10 90:1,
 14,15
York
 20:19,23
young
 75:6,11

May 25, 2021

1

Page 1

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

DR. THOMAS HUBBARD, PhD.)
Plaintiff,)
v.) CA NO. 1:20-cv-00767-RP
SARAH ALLEN BLAKEMORE; and) JURY DEMANDED
JOHN DOES 1 - 10,)
Defendants)

ORAL VIDEOTAPED DEPOSITION

THOMAS HUBBARD, Ph.D.

May 25, 2021

VOLUME 2

(Reported Remotely)

ORAL VIDEOTAPED DEPOSITION OF THOMAS HUBBARD, Ph.D.,
produced and appearing remotely (via Zoom) from the
offices of Wright & Greenhill, P.C.: 900 Congress
Avenue, Suite 500, Austin, Texas, 78701, as a witness at
the instance of the Defendant and duly sworn, was taken
in the above-styled and numbered cause, on May 25, 2021,
from 1:37 p.m. to 7:09 p.m., before Jennifer L.
Marquardt, Certified Shorthand Reporter in and for the
State of Texas, reported remotely by computerized
stenotype machine, pursuant to the Federal Rules of
Civil Procedure and in accordance with the current
Emergency Order Regarding the COVID-19 State of Disaster
and the provisions stated on the record or attached
hereto.

May 25, 2021

2 to 5

Page 2			Page 4		
1	APPEARANCES		1	EXHIBITS (cont.)	
2			2	EXHIBIT DESCRIPTION	PAGE
3	FOR THE PLAINTIFF, THOMAS HUBBARD, Ph.D.:		3	13 August 16, 2009, letter to	170
4	Joseph D. Sibley		4	Randy Diehl from Thomas Hubbard	
5	Camara & Sibley, L.L.P.		5	14 "Classics at the Intersections"	172
6	1108 Lavaca Street, Suite 110263		6	15 "Response: Davidson on	178
7	Austin, Texas 78701		7	Verstraete on Davidson, The	
8	Telephone: (713)966-6789		8	Greeks and Greek Love: A	
9	Facsimile: (713)583-1131		9	Radical Reappraisal of	
10	E-mail : Sibley@camarasibley.com		10	Homosexuality in Ancient	
11	FOR THE DEFENDANT, SARAH BLAKEMORE:		11	Greece"	
12	Brantley Ross Pringle, Jr.		12	16 Liv Mariah Yarrow's blog	180
13	Hoover Slovacek, L.L.P.		13	17 Introduction to a publication	181
14	5051 Westheimer, Suite 1200		14	of writings by sex offenders	
15	Houston, Texas 77056		15	18 Copy of original EEOC complaint	195
16	Telephone: (713)977-8686		16	19 Series of e-mails	211
17	Facsimile: (713)977-5395		17	***Court Reporter's Note: Court reporter was never	
18	E-mail : Rpringle@w-g.com		18	given possession of	
19			19	exhibits ***	
20	ALSO PRESENT:		20		
21	Sarah Allen Blakemore		21		
22	U.S. Legal Support videographer		22		
23			23		
24			24		
25			25		

Page 3			Page 5		
1	INDEX		1	THE VIDEOGRAPHER: We're back on the	
2		PAGE	2	record at 1:37.	
3	Appearances	2	3	THE REPORTER: Okay. Okay. My name is	
4	THOMAS HUBBARD, Ph.D.		4	Jennifer Marquardt, CSR No. 7034. I'm administering the	
5	Examination by Mr. Pringle, Jr.	5	5	oath and reporting the deposition remotely by	
6	Changes and Signature Page	222	6	stenographic means from Houston, Texas, representing the	
7	Court Reporter's Certificate	224	7	office of U.S. Legal Support, located at 16825	
8			8	Northchase Drive, Suite 900, Houston, Texas 77060. This	
9	EXHIBITS		9	is the oral deposition of Thomas Hubbard.	
10	EXHIBIT DESCRIPTION PAGE		10	THOMAS HUBBARD, Ph.D.,	
11	3 Series of e-mails	23	11	having been first duly sworn, testified as follows:	
12	4 Series of e-mails	24	12	EXAMINATION	
13	5 "Pederasty and Democracy: The	61	13	Q. (BY MR. PRINGLE, JR.) All right. Dr. Hubbard,	
14	Marginalization of a Social		14	we're ready to go -- keep going?	
15	Practice" by Thomas K. Hubbard		15	A. Uh-huh.	
16	U.S. v. Mayer, 503 F.3d 740	63	16	Q. Okay. We were talking, before we left, about	
17	(2007)		17	the -- about the -- the day of the handing out of the	
18	7 "Sexual Consent and the	96	18	flyer in the classroom.	
19	Adolescent Male, or What We Can		19	A. Uh-huh.	
20	Learn from the Greeks"		20	Q. Was that the first indication of any event that	
21	8 "Introduction to Special Issue	155	21	gives rise to the lawsuit that you brought? First	
22	on Boys' Sexuality and Age of		22	indication that you had?	
23	Consent"		23	A. Yes.	
24	9 Unknown	159	24	Q. And do you remember the date that -- that that	
25	10 Retraction letter	162	25	happened with the flyer being handed out?	
	11 Thomas Hubbard's response to	164			
	rumors on social media				
	12 Series of e-mails	165			

May 25, 2021

6 to 9

<p style="text-align: right;">Page 6</p> <p>1 A. I believe it was November 21st of 2019.</p> <p>2 Q. The date of the flyer itself?</p> <p>3 A. Yes.</p> <p>4 Q. And at that time, you were teaching the</p> <p>5 mythologies of -- excuse me --</p> <p>6 A. Classical Mythology.</p> <p>7 Q. Classical Mythology.</p> <p>8 And that was -- where was that class held?</p> <p>9 A. Flawn Academic Center 21.</p> <p>10 THE REPORTER: Could -- I'm sorry, could</p> <p>11 you repeat that, please?</p> <p>12 A. Flawn Academic Center, Room 21. That's Flawn,</p> <p>13 spelled F-L-A-W-N.</p> <p>14 MR. PRINGLE, JR.: Do you need to be</p> <p>15 closer?</p> <p>16 THE REPORTER: I'm hearing him fine. It</p> <p>17 was just very low, so . . .</p> <p>18 MR. PRINGLE, JR.: Okay.</p> <p>19 Q. (BY MR. PRINGLE, JR.) And what time of day was</p> <p>20 the class offered?</p> <p>21 A. I -- it was morning. I believe it was around</p> <p>22 11:00.</p> <p>23 Q. And describe what you saw or what happened to</p> <p>24 you that day when you got to class.</p> <p>25 A. Well, I got to class only a couple of minutes</p>	<p style="text-align: right;">Page 8</p> <p>1 A. She said, "You can go ahead and sue me, I don't</p> <p>2 care."</p> <p>3 Q. All right. Anything else that she said in</p> <p>4 response?</p> <p>5 A. That's all I remember in response to that --</p> <p>6 well, that statement of mine.</p> <p>7 Q. All right. And -- and then what happened?</p> <p>8 Kind of walk me through the interaction.</p> <p>9 A. As I said, I asked her about her grade. Based</p> <p>10 on my experience of 40-odd years of teaching, that most</p> <p>11 students who are unhappy with me are unhappy because</p> <p>12 they're not getting a good grade. And I'm a rather</p> <p>13 unusually tough grader and assign people heavy workloads</p> <p>14 for reasons, I think, I've already explained, because I</p> <p>15 think easy As and light workloads result in less</p> <p>16 educational benefit.</p> <p>17 Q. All right. You asked her what grade she -- she</p> <p>18 had or was making?</p> <p>19 A. Uh-huh.</p> <p>20 Q. Yes?</p> <p>21 A. Yes.</p> <p>22 Q. And what was her response?</p> <p>23 A. She never responded to that directly, but she</p> <p>24 said, "I dropped you."</p> <p>25 Q. Okay. And then what happened?</p>
<p style="text-align: right;">Page 7</p> <p>1 before it began, and what I saw was the defendant and</p> <p>2 one other young woman, whom I did not recognize, with</p> <p>3 posters and maybe even balloons handing out these</p> <p>4 flyers. And the defendant handed me one and announced</p> <p>5 who she was.</p> <p>6 Q. Were the -- were these two women, were they --</p> <p>7 were they at the door of your classroom?</p> <p>8 A. Yes, right in front of the double doors.</p> <p>9 Q. And are these the main doors into the</p> <p>10 classroom?</p> <p>11 A. Yes, the only doors.</p> <p>12 Q. All right. And I assume that they'd be the</p> <p>13 door that you would enter as well?</p> <p>14 A. Yes.</p> <p>15 Q. All right. And she handed you the flyer. Did</p> <p>16 you -- did you say anything to her?</p> <p>17 A. Yes. The -- the first thing I -- well, I read</p> <p>18 it, and the first thing I said is "This is libelous."</p> <p>19 Q. What else did you say?</p> <p>20 A. After she responded to that, I then asked</p> <p>21 her -- and told me that she had dropped the course -- or</p> <p>22 no. I -- I then asked her what grade she was getting,</p> <p>23 and then she said she had dropped the course.</p> <p>24 Q. So, when you said, "This is libelous" or words</p> <p>25 to that effect, what was her response?</p>	<p style="text-align: right;">Page 9</p> <p>1 A. I don't -- I -- I don't really remember any</p> <p>2 intersection with her after that. I just went into the</p> <p>3 room after.</p> <p>4 Q. So, have we talked about your discussions with</p> <p>5 her at the door of your classroom when she handed you</p> <p>6 the flyer?</p> <p>7 A. Yes.</p> <p>8 Q. Are there any other details you recall?</p> <p>9 A. Not that I recall.</p> <p>10 Q. Did you have any discussions with the other</p> <p>11 woman who was handing out a flyer?</p> <p>12 A. No.</p> <p>13 Q. Do you know who that is?</p> <p>14 A. No.</p> <p>15 Q. As we sit here today, do you know that is?</p> <p>16 A. No.</p> <p>17 Q. Did anybody witness your exchange with --</p> <p>18 A. No.</p> <p>19 Q. -- Miss Blakemore?</p> <p>20 A. No. There might've been another student or two</p> <p>21 who came into the auditorium during that, but I don't</p> <p>22 remember. I was really focused on her, because I was</p> <p>23 quite shocked at what she was doing there.</p> <p>24 Q. All right. So, then you went in. Then what</p> <p>25 happened?</p>

May 25, 2021

10 to 13

<p style="text-align: right;">Page 10</p> <p>1 A. Well, it was still a couple minutes till the</p> <p>2 start of the class. My TAs were getting the, you know,</p> <p>3 PowerPoint ready and -- and things like that. I -- I</p> <p>4 asked them if they had received this flyer, and they</p> <p>5 said that they had. And then when I started class, I</p> <p>6 took about five minutes to address this and asked</p> <p>7 students if they had any questions about it. And, you</p> <p>8 know, I really did not want it to detract too much from</p> <p>9 class time focusing on the subject, but on the other</p> <p>10 hand, I did believe it deserved some response.</p> <p>11 Q. Is the five minutes that you spent addressing</p> <p>12 it that morning in class, is that recorded anywhere?</p> <p>13 A. No, I do not record my classes.</p> <p>14 Q. Is that documented anywhere, what you said?</p> <p>15 A. Not in documentary form, but the two TAs might</p> <p>16 remember it.</p> <p>17 Q. Well, other than people relying upon their</p> <p>18 memory who might've heard it, is it recorded anywhere?</p> <p>19 A. No.</p> <p>20 Q. Or documented --</p> <p>21 A. No.</p> <p>22 Q. -- anywhere?</p> <p>23 A. No, because I was speaking extempore. I had no</p> <p>24 idea this was going to happen.</p> <p>25 Q. Indeed.</p>	<p style="text-align: right;">Page 12</p> <p>1 Q. (BY MR. PRINGLE, JR.) Did you ever say, "What</p> <p>2 you're saying about me is incorrect"?</p> <p>3 MR. SIBLEY: Objection, form.</p> <p>4 A. I believe all of these things that you are</p> <p>5 asking are implicit in the statement that it is</p> <p>6 libelous.</p> <p>7 Q. (BY MR. PRINGLE, JR.) I'm asking explicit. Did</p> <p>8 you explicitly say any of those things?</p> <p>9 A. I did not use the words that you are using</p> <p>10 like . . .</p> <p>11 Q. The only thing you said is "This is libelous"?</p> <p>12 A. To my rec -- to the best of my recollection.</p> <p>13 Q. And so tell me what you told the class</p> <p>14 extempore.</p> <p>15 A. That this was probably the work of a</p> <p>16 disgruntled former student.</p> <p>17 Oh. The first thing I asked them was,</p> <p>18 "Have any of you ever heard me advocate pedophilia in</p> <p>19 this class?"</p> <p>20 And no one raised their hand. They --</p> <p>21 Q. Nobody did that, right?</p> <p>22 A. Yeah. Because, in fact -- although there were</p> <p>23 a couple of miss -- we discussed the concerted pederast,</p> <p>24 there was nothing about pedophilia and certainly nothing</p> <p>25 advocated.</p>
<p style="text-align: right;">Page 11</p> <p>1 So, that morning when you saw the flyer,</p> <p>2 you read it. Presumably, you -- you understood it,</p> <p>3 right?</p> <p>4 A. Yes.</p> <p>5 Q. And you told Miss Blakemore that it was</p> <p>6 libelous?</p> <p>7 A. I did.</p> <p>8 Q. Did you ever deny anything that was in there --</p> <p>9 in there?</p> <p>10 MR. SIBLEY: Objection, form.</p> <p>11 A. Stating that it is libelous is itself a</p> <p>12 statement that there are untruths in the document and</p> <p>13 that they harm my representation.</p> <p>14 Q. (BY MR. PRINGLE, JR.) Did you ever say, "This</p> <p>15 is untrue"?</p> <p>16 MR. PRINGLE, JR.: Objection.</p> <p>17 A. No, I did not use that word.</p> <p>18 Q. (BY MR. PRINGLE, JR.) Did you ever say, "This</p> <p>19 is false"?</p> <p>20 MR. SIBLEY: Objection.</p> <p>21 A. I -- I do not remember using that word.</p> <p>22 Q. (BY MR. PRINGLE, JR.) Did you ever say, "This</p> <p>23 paints me in a false light"?</p> <p>24 MR. SIBLEY: Objection, form.</p> <p>25 A. I did not use that phrase.</p>	<p style="text-align: right;">Page 13</p> <p>1 Q. Did you ever ask the class if anyone had ever</p> <p>2 heard you advocating for sex between minor children and</p> <p>3 adult males?</p> <p>4 A. Not in those terms. But the term she used was</p> <p>5 "pedophilia."</p> <p>6 And I asked them, "Have you ever heard me</p> <p>7 advocating that?"</p> <p>8 And -- and no one acknowledged that they</p> <p>9 had.</p> <p>10 Q. All right. What else did you tell them?</p> <p>11 A. I be -- well, I gave them a chance to ask</p> <p>12 questions, and, I believe, one student who was sitting</p> <p>13 in the front row asked me, well, thought about this</p> <p>14 charge even published for both with NAMBLA.</p> <p>15 Q. Okay. We'll get -- we'll get to the questions</p> <p>16 in a minute, but maybe we should do it this way. Kind</p> <p>17 of walk me through the interaction that you had with</p> <p>18 your class over that five-minute period. First, you</p> <p>19 asked: Has anybody heard me advocate for pedophilia,</p> <p>20 and no one raised their hand. True?</p> <p>21 A. Yes.</p> <p>22 Q. Then, you asked what? You said what?</p> <p>23 A. I can't give you the exact sequence of</p> <p>24 statements. This is sometime ago, and --</p> <p>25 Q. Just do your best.</p>

May 25, 2021

14 to 17

<p style="text-align: right;">Page 14</p> <p>1 A. -- I was obviously upset at the time because I</p> <p>2 thought this would distract the class from what we're</p> <p>3 supposed to be doing there. I believe that at some</p> <p>4 point I made the statement that this was the work of a</p> <p>5 disgruntled student and left it at that.</p> <p>6 Q. And what evidence did you have of that?</p> <p>7 A. My 40 years of experience, that usually what</p> <p>8 students are upset with me about is they're not doing</p> <p>9 well --</p> <p>10 Q. Okay.</p> <p>11 A. -- in the class.</p> <p>12 Q. It is -- is it inconceivable to you that a</p> <p>13 student might be upset at you for another reason?</p> <p>14 A. Well, I know some students from religiously</p> <p>15 conservative backgrounds may object to my being gay,</p> <p>16 which I make no attempt to hide. And on the other hand,</p> <p>17 I also do not proclaim it at the beginning of my class,</p> <p>18 but, you know, it's something that is widely known about</p> <p>19 me. Some students may object to there being a sexual</p> <p>20 content to many of the Greek myths, but you cannot teach</p> <p>21 Greek Mythology in a comprehensive way if you</p> <p>22 vulgarize (phonetic) those particular stories because</p> <p>23 they are an important part of the subject matter. And,</p> <p>24 you know, students are worried about that at the</p> <p>25 beginning of the semester.</p>	<p style="text-align: right;">Page 16</p> <p>1 often rape, in the context of ancient Greece, and</p> <p>2 pederastic relations between adult men and underage</p> <p>3 boys?</p> <p>4 A. As those things come up in the myth.</p> <p>5 Q. Okay.</p> <p>6 A. And there are a large numbers of the future</p> <p>7 Gods raping --</p> <p>8 THE REPORTER: I'm sorry, I can't hear the</p> <p>9 last part. "Future Gods"?</p> <p>10 A. There are a large number of myths about Gods</p> <p>11 raping mortal women, but I also tell the class that in</p> <p>12 any story where a human male rapes a woman or a boy,</p> <p>13 they always come to a bad end and get punished for it.</p> <p>14 Q. (BY MR. PRINGLE, JR.) Okay. Now, is there</p> <p>15 anything about the flyer that points out that you are</p> <p>16 gay?</p> <p>17 A. No.</p> <p>18 Q. Do you have any reason to believe that Sarah</p> <p>19 Blakemore disapproves of you being gay?</p> <p>20 A. Well, when I learned about the political</p> <p>21 background of her family and their association with Dan</p> <p>22 Patrick, that thought certainly crossed my mind.</p> <p>23 Q. I'm not asking about thoughts crossing your</p> <p>24 mind. I'm asking you about evidence. Do you have any</p> <p>25 evidence that Sarah Blakemore is disapproving of your</p>
<p style="text-align: right;">Page 15</p> <p>1 Q. Why are they worried?</p> <p>2 A. 'Cause some students find any discussion of</p> <p>3 sexuality offensive. I mean, that has sometimes come up</p> <p>4 in the written comments that students leave on their</p> <p>5 course evaluations.</p> <p>6 Q. So --</p> <p>7 A. So, it's not a huge number of students, but in</p> <p>8 a class of a hundred or two hundred, there are sometimes</p> <p>9 a couple.</p> <p>10 Q. So, sometimes some of the students leave</p> <p>11 evaluations or comments on your course where they object</p> <p>12 to your discussions for the subject matter of, say, rape</p> <p>13 and pederastic relations back in ancient Greece. Is --</p> <p>14 MR. SIBLEY: Objection.</p> <p>15 Q. (BY MR. PRINGLE, JR.) -- that -- is that fair</p> <p>16 to say?</p> <p>17 MR. SIBLEY: Objection.</p> <p>18 A. No.</p> <p>19 Q. (BY MR. PRINGLE, JR.) Why not?</p> <p>20 A. 'Cause I do not recall them using those terms.</p> <p>21 It -- it's usually sexual content or something of that</p> <p>22 nature.</p> <p>23 Q. All right. It's sexual content that you --</p> <p>24 A. It -- it's something that --</p> <p>25 Q. Yeah, but the sexual consent that you teach is</p>	<p style="text-align: right;">Page 17</p> <p>1 status as a gay man?</p> <p>2 MR. SIBLEY: Objection, form.</p> <p>3 Q. (BY MR. PRINGLE, JR.) Any evidence?</p> <p>4 MR. SIBLEY: Objection, form.</p> <p>5 A. We have not found any explicit statements from</p> <p>6 her saying that. So, in terms of evidence, no.</p> <p>7 Q. (BY MR. PRINGLE, JR.) Have you --</p> <p>8 A. It was just an educated guess, which is all I</p> <p>9 could do.</p> <p>10 Q. Have you found any implicit statements?</p> <p>11 A. Only --</p> <p>12 Q. Was there --</p> <p>13 A. -- the -- only the fact that there is</p> <p>14 widespread public association of gay males with underage</p> <p>15 relations. And I can document this through public</p> <p>16 opinion polling and through a number of articles that</p> <p>17 you can find on the internet from social conservative</p> <p>18 groups, like the American Family Association and people</p> <p>19 associated with, what we would call, religious</p> <p>20 fundamentalists.</p> <p>21 Q. Is Sarah Blakemore a religious fundamentalist?</p> <p>22 A. I don't know.</p> <p>23 Q. You don't have any -- you don't know one way or</p> <p>24 the other, do you?</p> <p>25 A. All I know is that her father's biography says</p>

May 25, 2021

18 to 21

<p style="text-align: right;">Page 18</p> <p>1 they're Presbyterian -- that he is Presbyterian --</p> <p>2 Q. All right.</p> <p>3 A. -- and a member of a Presbyterian church in</p> <p>4 Houston.</p> <p>5 Q. Well, you don't believe that all Presbyterians</p> <p>6 are religious fundamentalists, do you?</p> <p>7 A. No. I -- I -- in fact, it's considered one of</p> <p>8 the more progressive positive denominations.</p> <p>9 Q. All right. So, again, do you have any evidence</p> <p>10 whatsoever that Sarah Blakemore is in any way</p> <p>11 disapproving of you as a gay male?</p> <p>12 MR. SIBLEY: Objection, form.</p> <p>13 A. Only a guess based on her family's association</p> <p>14 with Dan Patrick, who is well evidenced as being</p> <p>15 disapproving of gay.</p> <p>16 Q. (BY MR. PRINGLE, JR.) So, the only evidence you</p> <p>17 have is just there is that evidence?</p> <p>18 A. Yes.</p> <p>19 Q. And based on that, you think she's a religious</p> <p>20 fundamentalist?</p> <p>21 A. No, but children at -- young people at that age</p> <p>22 often tend to be influenced by their parents' values.</p> <p>23 Q. And what analysis have you done on Sarah to</p> <p>24 reach that conclusion for her? Zero?</p> <p>25 MR. SIBLEY: Objection, form.</p>	<p style="text-align: right;">Page 20</p> <p>1 THE REPORTER: I need you to speak up,</p> <p>2 Counsel.</p> <p>3 MR. SIBLEY: Objection, form. It's always</p> <p>4 gonna be objection, form probably every time I speak.</p> <p>5 THE REPORTER: Thank you, but I may not</p> <p>6 even hear the objection, sir, so I need you to speak --</p> <p>7 MR. SIBLEY: Okay.</p> <p>8 THE REPORTER: -- up.</p> <p>9 MR. SIBLEY: I'm just letting you know</p> <p>10 that we -- you weren't here earlier, so we agreed that</p> <p>11 every objection will be objection, form. So, that's it.</p> <p>12 MR. PRINGLE, JR.: Do you just wanna say,</p> <p>13 "Objection"?</p> <p>14 MR. SIBLEY: Yeah, I'm just gonna say,</p> <p>15 "Objection."</p> <p>16 MR. PRINGLE, JR.: Yeah.</p> <p>17 A. Could we, perhaps, bring the computer closer so</p> <p>18 she can --</p> <p>19 MR. SIBLEY: Yeah --</p> <p>20 A. -- hear better?</p> <p>21 MR. PRINGLE, JR.: It's a good idea.</p> <p>22 THE VIDEOGRAPHER: I'll grab it.</p> <p>23 MR. PRINGLE, JR.: And do you want to go</p> <p>24 closer than that?</p> <p>25 THE WITNESS: You have a projector.</p>
<p style="text-align: right;">Page 19</p> <p>1 A. The people who have looked at her Facebook page</p> <p>2 said that she was -- had proved that she has -- as part</p> <p>3 of her bio of self presentation there, that she said she</p> <p>4 was interested in Republican politics, which was not at</p> <p>5 all surprising, to me, given her having involvement of</p> <p>6 the rest of her family.</p> <p>7 Q. (BY MR. PRINGLE, JR.) But that's not something</p> <p>8 you have any personal knowledge of, is it?</p> <p>9 MR. SIBLEY: Objection, form.</p> <p>10 A. No, because I don't know her, her or her</p> <p>11 family.</p> <p>12 Q. (BY MR. PRINGLE, JR.) Well, you don't have any</p> <p>13 knowledge of her -- of her social media postings, do</p> <p>14 you?</p> <p>15 A. Not directly. I've only been told by others</p> <p>16 who examined.</p> <p>17 Q. You have hearsay evidence from other people,</p> <p>18 correct?</p> <p>19 MR. SIBLEY: Objection, form.</p> <p>20 A. You could call it that, but from other people I</p> <p>21 trust.</p> <p>22 Q. (BY MR. PRINGLE, JR.) Yeah. What would you</p> <p>23 call it if not hearsay evidence?</p> <p>24 MR. SIBLEY: Objection, form.</p> <p>25 A. That would --</p>	<p style="text-align: right;">Page 21</p> <p>1 MR. PRINGLE, JR.: Yeah. I'd rather have</p> <p>2 with the -- this is in everything they -- frame a little</p> <p>3 bit -- that's okay. I'd rather have her hearing well.</p> <p>4 THE WITNESS: Yeah, you may have to lean.</p> <p>5 Q. (BY MR. PRINGLE, JR.) All right. So, you --</p> <p>6 after the five-minute period in which you were -- you</p> <p>7 were concerned about the disruption to your class --</p> <p>8 A. Uh-huh.</p> <p>9 Q. -- did you go ahead and teach the class?</p> <p>10 A. Yes.</p> <p>11 Q. And what happened next in this ongoing saga?</p> <p>12 What did you do next?</p> <p>13 A. You mean after finishing the class?</p> <p>14 Q. Yes.</p> <p>15 A. I went back to the office with my TAs. My</p> <p>16 office is in a different building.</p> <p>17 Q. And your -- your TAs at the time who were with</p> <p>18 you that day are who?</p> <p>19 A. As I have stated before: John Anderson and</p> <p>20 Alain Zaramian.</p> <p>21 Q. And where is John now?</p> <p>22 A. He is still a graduate student in our</p> <p>23 department. I do not know specifically if he's in</p> <p>24 Austin, but he probably is.</p> <p>25 Q. Okay. So, you went back to your office, and</p>

May 25, 2021

22 to 25

<p style="text-align: right;">Page 22</p> <p>1 did you have discussions with John and Alain?</p> <p>2 A. I think so, but I -- I -- I -- I don't remember</p> <p>3 very much about the exact content of those discussions,</p> <p>4 other than the incident was very jarring to all of us.</p> <p>5 Very upsetting, so there was some discussion.</p> <p>6 Q. Did you report it?</p> <p>7 A. You mean report it to other university</p> <p>8 authorities?</p> <p>9 Q. Report it to anybody, including the university</p> <p>10 authorities.</p> <p>11 A. Not that day, but, I think, the next day I</p> <p>12 received a call from the Provost's office, saying that</p> <p>13 they had detected a lot of social media chatter</p> <p>14 targeting me and they were concerned by it and concerned</p> <p>15 for my safety.</p> <p>16 Q. I see. And did you ever review any of that</p> <p>17 social media chatter?</p> <p>18 A. I make no use of social media. I think it is a</p> <p>19 sewer and poison. I absolutely abhor it.</p> <p>20 Q. So, I take it by the answer, you didn't. You</p> <p>21 never reviewed any social media posts; is that correct?</p> <p>22 A. No, but other people I know and trust did.</p> <p>23 Q. All right. But in terms of having personal</p> <p>24 knowledge of social media posts, you have zero, correct?</p> <p>25 A. Yes, other than what has been since given to us</p>	<p style="text-align: right;">Page 24</p> <p>1 something?</p> <p>2 MR. PRINGLE, JR.: That's probably it.</p> <p>3 Thank you. Voilà.</p> <p>4 Q. (BY MR. PRINGLE, JR.) Okay. And let's look at</p> <p>5 these in reverse order, Professor.</p> <p>6 A. Okay.</p> <p>7 Q. And I don't know this is the first</p> <p>8 communication, but it's an early communication. Are you</p> <p>9 with me on the November 30 -- November 23, 2019, 2:28</p> <p>10 e-mail that you sent to David --</p> <p>11 A. Ochsner.</p> <p>12 Q. -- Ochsner?</p> <p>13 And who's David Ochsner?</p> <p>14 A. He is the assistant dean for communications.</p> <p>15 And Carmen Shockley -- I -- I told Carmen Shockley that</p> <p>16 the one thing the university could help me with was in</p> <p>17 formulating a response to this so that we could tamp it</p> <p>18 down and, you know, have less disturbance of my</p> <p>19 students, as well as me. And she recommended that I get</p> <p>20 in touch with the communications director within my</p> <p>21 college, and that is David Ochsner.</p> <p>22 Q. Well, then, maybe we should -- we should talk</p> <p>23 about this e-mail after we talk about the other e-mails.</p> <p>24 A. Uh-huh.</p> <p>25 (Exhibit 4 marked)</p>
<p style="text-align: right;">Page 23</p> <p>1 in discovery.</p> <p>2 Q. Sure. But at the time, you had --</p> <p>3 A. No.</p> <p>4 Q. -- no knowledge of?</p> <p>5 All right. Who was the provost that you</p> <p>6 had interactions with?</p> <p>7 A. Initially, it was Carmen Shockley, who was, I</p> <p>8 think, an assistant. An assistant to Janet Dukerich,</p> <p>9 who was herself a vice provost.</p> <p>10 (Exhibit 3 marked)</p> <p>11 Q. (BY MR. PRINGLE, JR.) Okay. We have -- you</p> <p>12 have Exhibit 3 there in front of you.</p> <p>13 A. Uh-huh.</p> <p>14 MR. SIBLEY: Can I get a copy of it?</p> <p>15 MR. PRINGLE, JR.: Yeah, you copy that.</p> <p>16 Are you sure I haven't given you a copy?</p> <p>17 MR. SIBLEY: Yes. I've got two here.</p> <p>18 MR. PRINGLE, JR.: Huh.</p> <p>19 A. I mean, do you want me to review all of these</p> <p>20 pages, or --</p> <p>21 Q. (BY MR. PRINGLE, JR.) Uh . . .</p> <p>22 A. -- you'll go through them one by one?</p> <p>23 Q. I was gonna go through them, but I seem to have</p> <p>24 misplaced my copy. Let me just look at it real quick.</p> <p>25 UNIDENTIFIED FEMALE SPEAKER: Joe, is this</p>	<p style="text-align: right;">Page 25</p> <p>1 Q. (BY MR. PRINGLE, JR.) Let's look at Exhibit No.</p> <p>2 4. Keep that handy or it'll disappear in the pile.</p> <p>3 This is -- if you look at the -- at the bottom or the</p> <p>4 back e-mail.</p> <p>5 A. You mean on page 1 or the very last page?</p> <p>6 Q. The very last page. It looks like it's a</p> <p>7 e-mail: Friday, November 22nd, at 6:57 p.m. That's the</p> <p>8 next day.</p> <p>9 A. Friday, November 22nd. That's not in Exhibit</p> <p>10 4.</p> <p>11 Q. Really? On the last page of your --</p> <p>12 A. I have only three pages, but it says it's 4 of</p> <p>13 6, 5 of 6, and 6 of 6 --</p> <p>14 Q. Okay.</p> <p>15 A. -- so I think some pages are missing.</p> <p>16 Q. See that?</p> <p>17 A. Oh.</p> <p>18 Q. Is that when you sent the flyer to Janet</p> <p>19 Dukerich?</p> <p>20 A. Yes. I -- I think she asked to see that.</p> <p>21 Q. And then there's a notation of the quoted text</p> <p>22 hidden. What did you tell Janet Dukerich that we can't</p> <p>23 see on this e-mail; do you know?</p> <p>24 A. I don't know.</p> <p>25 Q. You still have this e-mail?</p>

May 25, 2021

26 to 29

<p style="text-align: right;">Page 26</p> <p>1 A. I could probably find it.</p> <p>2 Q. You haven't destroyed or -- or discarded any</p> <p>3 e-mails relating to this dispute, have you?</p> <p>4 A. No. No, because I was very strongly warned by</p> <p>5 my counsel not to do that.</p> <p>6 Q. All right. And then there's a e-mail to</p> <p>7 Sherrard Butch Hayes?</p> <p>8 A. Uh-huh.</p> <p>9 Q. Who is that?</p> <p>10 A. That is one of my other attorneys.</p> <p>11 Q. And does he -- does Mr. Hayes represent you in</p> <p>12 this matter at all?</p> <p>13 A. Not in the likeness.</p> <p>14 Q. What does Mr. Hayes represent you on?</p> <p>15 A. Our dealings with the University of Texas.</p> <p>16 Q. Is there a separate lawsuit over that?</p> <p>17 A. Not yet.</p> <p>18 Q. Uh . . .</p> <p>19 A. There is an EEOC complaint.</p> <p>20 Q. And Mr. Hayes represents you in an EEOC</p> <p>21 complaint?</p> <p>22 A. Yes.</p> <p>23 Q. And an EEOC complaint, for the members of the</p> <p>24 jury, is an Equal Employment Opportunity Commission</p> <p>25 complaint?</p>	<p style="text-align: right;">Page 28</p> <p>1 I also complained that the -- that this</p> <p>2 had very much harmed the reputation of UT Austin in</p> <p>3 public media. I mean, the -- the whole letter was about</p> <p>4 ten pages. And we felt that President Fennes and</p> <p>5 university communications response to the attack upon me</p> <p>6 by the defendant were not only unhelpful but actually</p> <p>7 exacerbated the situation and that he was retaliating</p> <p>8 for my having critiqued that study. I have seen later</p> <p>9 information, from Chancellor McRaven, to the effect that</p> <p>10 the Regents took my complaint very seriously and that</p> <p>11 there was quite a debate about whether to continue</p> <p>12 funding that study.</p> <p>13 Q. Again, do you remember what my question was?</p> <p>14 A. Your -- your question was about my EEOC</p> <p>15 complaint and the basis for retali -- claiming</p> <p>16 retaliation.</p> <p>17 Q. No, sir. That's false.</p> <p>18 My question to you was, are you making</p> <p>19 a -- a claim in your EEOC complaint about the -- your --</p> <p>20 your freedom of speech?</p> <p>21 MR. SIBLEY: Objection, form.</p> <p>22 A. What I said was --</p> <p>23 Q. (BY MR. PRINGLE, JR.) That's a yes or no</p> <p>24 question.</p> <p>25 MR. SIBLEY: Objection, form.</p>
<p style="text-align: right;">Page 27</p> <p>1 A. Yes.</p> <p>2 Q. You are making a sex discrimination claim</p> <p>3 against yourself?</p> <p>4 A. Against myself? What do you mean by that?</p> <p>5 Q. Are you making a sex discrimination claim on</p> <p>6 your behalf? Do you think that you've been sex</p> <p>7 discriminated on behalf of -- on -- on the basis of your</p> <p>8 sex?</p> <p>9 A. Sex, sexual orientation, and retaliation for</p> <p>10 protected speech.</p> <p>11 Q. You're making an EEOC complaint on the be --</p> <p>12 behalf of -- on the basis of protected speech?</p> <p>13 A. Yes, because, in 2017, I sent to President</p> <p>14 Fennes and cc'd the Board of Regents a detailed critique</p> <p>15 of a 1.7 million dollar study produced by an institute</p> <p>16 in the School of Social Work that purported to report a</p> <p>17 shockingly high rate of sexual assault and sexual</p> <p>18 harassment at UT Austin. After reviewing that document</p> <p>19 and the documentation behind that document and</p> <p>20 discussing it with social scientists who are experienced</p> <p>21 and knowledgeable in the area of sexological research, I</p> <p>22 concluded that that document was fatally flawed, used a</p> <p>23 bias sampling technique, asked confusing questions, and</p> <p>24 greatly overrepresented the rate of sexual assault and</p> <p>25 sexual harassment at the university.</p>	<p style="text-align: right;">Page 29</p> <p>1 A. Yes.</p> <p>2 Q. (BY MR. PRINGLE, JR.) There you go.</p> <p>3 A. Protected speech is freedom of speech.</p> <p>4 Q. Yes. Okay. Let's go to page 5 of 6 of this</p> <p>5 exhibit that we're looking at, Exhibit 4.</p> <p>6 A. Page of 5 of 6. Okay.</p> <p>7 Q. You see that?</p> <p>8 A. Uh-huh.</p> <p>9 Q. And that's your e-mail to Janet and Carmen,</p> <p>10 November 29, 2019.</p> <p>11 A. Uh-huh.</p> <p>12 Q. Yes?</p> <p>13 A. Yes.</p> <p>14 Q. And do you -- you post a picture of my client</p> <p>15 from her way -- Facebook page, correct?</p> <p>16 A. Yes. Yes.</p> <p>17 Q. And you say that she's posing on her Facebook</p> <p>18 page with an assault rifle.</p> <p>19 A. That's what it -- that's what it looks like to</p> <p>20 me, but I have never touched a gun. I don't know guns.</p> <p>21 And the whole definition of what is an assault rifle is</p> <p>22 something that is very much controverted.</p> <p>23 Q. So, then, why would you report that she's</p> <p>24 posing what -- what appears to be an assault rifle if</p> <p>25 you don't even know what one is?</p>

May 25, 2021

30 to 33

<p style="text-align: right;">Page 30</p> <p>1 MR. SIBLEY: Objection, form.</p> <p>2 A. It is certainly -- it certainly looks like a</p> <p>3 high powered rifle, and, you know, she's posing with a</p> <p>4 dead deer.</p> <p>5 Q. (BY MR. PRINGLE, JR.) Yeah, I see that.</p> <p>6 You indicate that she appeared obviously</p> <p>7 unstable.</p> <p>8 A. Yes, she -- she was very nervous when she</p> <p>9 handed the flyer to me.</p> <p>10 Q. Well, nervous is not unstable, is it? Or is</p> <p>11 it, in your mind?</p> <p>12 A. I believe that the attempt to smear me in this</p> <p>13 confrontational way would not be the action of a</p> <p>14 well-balanced and mature person and that, you know, a --</p> <p>15 a -- a more stable person would have, first, come to</p> <p>16 talk to me to express her concerns or misunderstandings</p> <p>17 of my scholarship.</p> <p>18 Q. Do you know whether or not Sarah Blakemore was</p> <p>19 unwilling to talk to you as, you reported, other</p> <p>20 undergraduates were unwilling to interact with you?</p> <p>21 MR. SIBLEY: Objection.</p> <p>22 A. I know of no evidence of other undergraduates</p> <p>23 being unwilling to do so.</p> <p>24 Q. (BY MR. PRINGLE, JR.) No --</p> <p>25 A. Do you have any?</p>	<p style="text-align: right;">Page 32</p> <p>1 rights were one of her interests. And, to me, this</p> <p>2 picture is itself child pornography.</p> <p>3 Q. How old is she in that picture?</p> <p>4 A. She looks about 15.</p> <p>5 Q. And you say that's child pornography. Why do</p> <p>6 you say that?</p> <p>7 A. There is a certain genre of pornography, I</p> <p>8 mean, called Chicks with Guns, and I think this is --</p> <p>9 although not pornographic in the sense of nudity, I feel</p> <p>10 this photo exploits an underage person to advance --</p> <p>11 to -- to appeal to people who are preoccupied with guns</p> <p>12 and gun rights. And -- and from my perspective, of</p> <p>13 someone who has never touched a gun, would never have</p> <p>14 one in his house, and who is rather frightened by them,</p> <p>15 I -- I -- I find this objectionable.</p> <p>16 Q. And you think the picture that's in Exhibit 4</p> <p>17 of my client posing with a deer that she's killed is</p> <p>18 child pornography, is that what you said?</p> <p>19 A. Not in the literal sense of the term, but in a</p> <p>20 figurative sense. And I do recall talking with a -- one</p> <p>21 of the journalists who wrote about this, and she said</p> <p>22 that she also considered it child pornography.</p> <p>23 Q. Okay. And you think there's something</p> <p>24 seriously wrong with Sarah distributing this flyer --</p> <p>25 this flyer, correct?</p>
<p style="text-align: right;">Page 31</p> <p>1 Q. No complaints, but it's in the first exhibit,</p> <p>2 didn't we, from Mr. White?</p> <p>3 MR. SIBLEY: Objection.</p> <p>4 A. White had no credibility with me and he</p> <p>5 ultimately could not produce any documentation of what</p> <p>6 he said.</p> <p>7 Q. (BY MR. PRINGLE, JR.) And no students came</p> <p>8 forward, did they?</p> <p>9 MR. SIBLEY: Objection.</p> <p>10 A. You mean after the distribution of her flyer?</p> <p>11 Q. (BY MR. PRINGLE, JR.) I'll move on.</p> <p>12 A. Now, you have to be more specific in your</p> <p>13 questions.</p> <p>14 Q. Well, I will. I will. That's why I'm moving</p> <p>15 on.</p> <p>16 So, then, you raised this with the</p> <p>17 university behavioral concerns hotline, correct?</p> <p>18 A. No. I asked Janet Dukerich and Carmen Shockley</p> <p>19 whether I should.</p> <p>20 Q. Why didn't you raise it?</p> <p>21 A. I -- I sought their advice first. I mean, they</p> <p>22 are more experienced in these matters than I am.</p> <p>23 Q. And why did that even cross your mind?</p> <p>24 A. Well, this is someone who uses guns. And what</p> <p>25 I was told about her Facebook page was she said that gun</p>	<p style="text-align: right;">Page 33</p> <p>1 A. Yes.</p> <p>2 Q. And you indicate that "We cannot take the</p> <p>3 chance of another mass shooting at this university."</p> <p>4 Why did you say that?</p> <p>5 A. Well, one of the most famous things about the</p> <p>6 University of Texas is the shooting from the tower.</p> <p>7 Q. Were you implying that my client was capable of</p> <p>8 that?</p> <p>9 A. Who knows. She likes guns.</p> <p>10 Q. So, you --</p> <p>11 A. To my mind, she was unstable.</p> <p>12 Q. So, you were implying she was capable of mass</p> <p>13 shooting from the tower on campus; is that right?</p> <p>14 A. Not from the tower --</p> <p>15 MR. SIBLEY: Objection.</p> <p>16 A. -- because that has been closed.</p> <p>17 Q. (BY MR. PRINGLE, JR.) All right. I'll --</p> <p>18 A. I mean --</p> <p>19 Q. -- accept your friendly amendment to the</p> <p>20 question.</p> <p>21 You were implying that my client was</p> <p>22 capable of a mass shooting on the -- on the campus of</p> <p>23 the University of Texas because of this child</p> <p>24 pornography, photograph you saw of her posing with a</p> <p>25 gun -- with a -- a deer that she had shot in her</p>

May 25, 2021

34 to 37

<p style="text-align: right;">Page 34</p> <p>1 youth --</p> <p>2 MR. SIBLEY: Objection.</p> <p>3 Q. (BY MR. PRINGLE, JR.) -- is that right?</p> <p>4 A. Any human being with a gun is capable of a mass</p> <p>5 shooting. That is precisely why so many politicians</p> <p>6 want to regulate gun ownership.</p> <p>7 Q. So, is the question to my an -- is the answer</p> <p>8 to my question, yes, you were implying she was capable</p> <p>9 of that?</p> <p>10 A. Yes.</p> <p>11 Q. Even though you never talked to her, correct?</p> <p>12 A. Other than in that one confrontation.</p> <p>13 Q. And even though you had no first-hand knowledge</p> <p>14 about her at all, only based on what your associates</p> <p>15 have told you?</p> <p>16 A. Yes. I think at that time, it was based on,</p> <p>17 you know, what I had been told about the social --</p> <p>18 Q. And that was the extent of your research before</p> <p>19 you made these statements about my client, correct?</p> <p>20 A. As I have said, any human being with a gun is</p> <p>21 capable of doing bad things with it.</p> <p>22 Q. So, you did absolutely nothing to verify any</p> <p>23 facts about my client before you made this statement</p> <p>24 implying that she could shoot up the University of Texas</p> <p>25 campus, did you?</p>	<p style="text-align: right;">Page 36</p> <p>1 interference from the university's legal affairs office</p> <p>2 about, rather, I was revealing for a protected</p> <p>3 information of -- because they, apparently, even</p> <p>4 consider the student's name to be FERPA protected, and</p> <p>5 they were interfering with my ability to distribute this</p> <p>6 to the e-mail Listserv for my class and to the e-mail</p> <p>7 Listserv of graduate students in my department. Because</p> <p>8 I was very worried about the effect this would be having</p> <p>9 on them.</p> <p>10 MR. PRINGLE, JR.: Okay. Objection,</p> <p>11 nonresponsive.</p> <p>12 Q. (BY MR. PRINGLE, JR.) Well, let's look at the</p> <p>13 last e-mail on the last page of Exhibit 4. So, you</p> <p>14 indicate -- and there's three paragraphs in that e-mail.</p> <p>15 The last phrase of the second paragraph's referen --</p> <p>16 references your research, "which the activists have not</p> <p>17 even taken the time to read or understand."</p> <p>18 You see that?</p> <p>19 A. May I have time to read the entire e-mail?</p> <p>20 Q. You certainly may.</p> <p>21 A. Yes, what was your question about it?</p> <p>22 Q. How do you know the activists hadn't taken the</p> <p>23 time to read or understand your publications?</p> <p>24 A. Because the allegations were so appallingly</p> <p>25 simpleminded. That, no one who has read my work in its</p>
<p style="text-align: right;">Page 35</p> <p>1 MR. SIBLEY: Objection.</p> <p>2 A. The only thing that I did was ask certain</p> <p>3 people who were friendly to me to find out more about</p> <p>4 her, and they looked up her social media and sent me</p> <p>5 this, and this frightened me. I mean, you have to</p> <p>6 understand that after the classroom disruption, on</p> <p>7 November 21st, I was very agitated and -- and nervous,</p> <p>8 and I had good reason to be given what happened later.</p> <p>9 MR. PRINGLE, JR.: Objection,</p> <p>10 nonresponsive.</p> <p>11 Q. (BY MR. PRINGLE, JR.) Okay. Let's go to</p> <p>12 Exhibit 4 now -- I mean Exhibit 3 now. This is a series</p> <p>13 of e-mails that you had with Janet and others after the</p> <p>14 incident, correct?</p> <p>15 A. Yes.</p> <p>16 Q. You ultimately drafted a response to the flyer,</p> <p>17 correct?</p> <p>18 A. With the aid of Avi Underwood --</p> <p>19 Q. Okay.</p> <p>20 A. -- who was more experienced media relations.</p> <p>21 We also ran it by David Ochsner.</p> <p>22 Q. So, you ultimately issued some sort of a</p> <p>23 statement responding to the flyer, correct?</p> <p>24 A. Yes, but it -- it could only be posted a couple</p> <p>25 of weeks later, because I was experiencing some</p>	<p style="text-align: right;">Page 37</p> <p>1 totality could possibly believe the things that she</p> <p>2 stated.</p> <p>3 Q. That's according to you. But, how do you know</p> <p>4 that the activists hadn't taken the time to, at least,</p> <p>5 read your material?</p> <p>6 MR. SIBLEY: Objection.</p> <p>7 Q. (BY MR. PRINGLE, JR.) You don't know that, do</p> <p>8 you?</p> <p>9 MR. SIBLEY: Objection.</p> <p>10 A. You are asking an epistemological question.</p> <p>11 Q. (BY MR. PRINGLE, JR.) Well, thank you.</p> <p>12 A. No one knows anything with certainty. All I</p> <p>13 can do is judge a situation based upon probabilities,</p> <p>14 and I do believe -- and I still believe -- that the</p> <p>15 probability is that they had not made a careful study of</p> <p>16 the totality and context of my work or of other</p> <p>17 scholarship in that field.</p> <p>18 Q. So, then, can we agree that you don't know</p> <p>19 whether any of the people that have criticized you read</p> <p>20 your work?</p> <p>21 MR. SIBLEY: Objection.</p> <p>22 A. On an epistemological level, yes, we can agree</p> <p>23 to that.</p> <p>24 Q. (BY MR. PRINGLE, JR.) I don't know what</p> <p>25 "epistemological" means.</p>

May 25, 2021

38 to 41

<p style="text-align: right;">Page 38</p> <p>1 A. Well, perhaps my counsel, who was a philosophy</p> <p>2 major, could explain. Epistemology is the branch of</p> <p>3 philosophy that has to do with knowledge and</p> <p>4 presumption.</p> <p>5 Q. Personal knowledge?</p> <p>6 MR. SIBLEY: Objection.</p> <p>7 A. All knowledge.</p> <p>8 Q. (BY MR. PRINGLE, JR.) You don't have any -- you</p> <p>9 know what personal knowledge is?</p> <p>10 A. Direct personal familiarity with something?</p> <p>11 Q. No, you can't use "personal" in the definition.</p> <p>12 You know what personal knowledge is?</p> <p>13 MR. SIBLEY: Objection.</p> <p>14 Q. (BY MR. PRINGLE, JR.) What you see, hear,</p> <p>15 touch, feel, experience with your own five senses. Not</p> <p>16 what someone else tells you. Not what you assume. Not</p> <p>17 what you believe. That's what personal knowledge is.</p> <p>18 MR. SIBLEY: Objection.</p> <p>19 A. The philosophical term for what you describe is</p> <p>20 sensation.</p> <p>21 Q. (BY MR. PRINGLE, JR.) Perfect. Do you have any</p> <p>22 personal knowledge as to whether any of your -- these</p> <p>23 activists ever read any of your work?</p> <p>24 MR. SIBLEY: Objection.</p> <p>25 A. Not with my five senses. I only have an</p>	<p style="text-align: right;">Page 40</p> <p>1 convicted child molesters in prison?</p> <p>2 MR. SIBLEY: Objection.</p> <p>3 A. They are not members of my own family, and I do</p> <p>4 not have such intimate knowledge of them, as Sarah</p> <p>5 Blakemore would have of her father and her other family.</p> <p>6 And the -- any correspondence that we receive from</p> <p>7 prison is -- is part of our research on what makes these</p> <p>8 people do the things that they do.</p> <p>9 Again, if one looks at the totality of my</p> <p>10 scholarship, one knows -- and this includes some of the</p> <p>11 scholarship you have received on your subpoena -- one</p> <p>12 knows that I am not of the same orientation or view as</p> <p>13 people who molest children.</p> <p>14 Q. (BY MR. PRINGLE, JR.) And you don't know</p> <p>15 whether Sarah is of the same orientation and view as her</p> <p>16 father, do you?</p> <p>17 A. Not with epistemological certainty.</p> <p>18 Q. Or with any certainty? You wouldn't be able to</p> <p>19 swear to it, would you?</p> <p>20 A. No.</p> <p>21 Q. 'Cause you'd be guessing?</p> <p>22 MR. SIBLEY: Objection.</p> <p>23 A. I would be guessing based upon what I perceive</p> <p>24 as probabilities. But again, all that you are talking</p> <p>25 about is -- is known from Philosophy 101: No one has</p>
<p style="text-align: right;">Page 39</p> <p>1 educated guess.</p> <p>2 Q. (BY MR. PRINGLE, JR.) You can only reach</p> <p>3 conclusions; is that right?</p> <p>4 A. Conclusions based upon probabilities.</p> <p>5 Q. As you define them?</p> <p>6 A. That -- that's what we all do, given that human</p> <p>7 knowledge is, by definition, imperfect. Anyone with any</p> <p>8 knowledge of the history of philosophy knows that.</p> <p>9 Q. You also say in this next e-mail, on Sunday,</p> <p>10 November 24, 2019: Her father is a prominent re --</p> <p>11 republican political publicist and campaign strategist</p> <p>12 in Houston.</p> <p>13 A. Uh-huh. Yes.</p> <p>14 Q. And that's based on what people have told you?</p> <p>15 A. No, I did look up her father's website.</p> <p>16 Q. Okay. And then you say: So this attack may be</p> <p>17 coming from the social conservative right.</p> <p>18 Again, you're guessing about that, right?</p> <p>19 A. It is an educated guess based upon her father's</p> <p>20 touting his association with Dan Patrick and other</p> <p>21 candidates who are on the more right-wing side of the</p> <p>22 republican party of Texas.</p> <p>23 Q. Well, how would that be any different from</p> <p>24 assuming that your writings and your thinkings are</p> <p>25 associated with the people you associate with: The</p>	<p style="text-align: right;">Page 41</p> <p>1 certain knowledge of anything. In fact, Plato says we</p> <p>2 don't -- have certain knowledges even from our five</p> <p>3 senses.</p> <p>4 Q. (BY MR. PRINGLE, JR.) So, why is it important</p> <p>5 that her father is a prominent republican political</p> <p>6 publicist and campaign strategist? Why is that</p> <p>7 important?</p> <p>8 A. Because to an educated guess, that suggests</p> <p>9 political motivation to be attacked.</p> <p>10 Q. Educated guess, meaning your guess?</p> <p>11 MR. SIBLEY: Objection.</p> <p>12 A. Mine and that of others.</p> <p>13 Q. (BY MR. PRINGLE, JR.) The people that did the</p> <p>14 research for you?</p> <p>15 A. Yes.</p> <p>16 Q. Anybody else?</p> <p>17 A. Not that I can remember.</p> <p>18 Q. And the next e-mail up -- it's on this page</p> <p>19 that looks like this -- it says: Here is some research</p> <p>20 a friend of mine did on the student organizer's father</p> <p>21 who's Dan Patrick's main campaign strategist."</p> <p>22 A. Okay. Excuse me, which page?</p> <p>23 Q. I'm reading from your e-mail of Sunday,</p> <p>24 November 24, at 10:21 p.m. It's an e-mail to David</p> <p>25 Ochsner.</p>

May 25, 2021

42 to 45

<p style="text-align: right;">Page 42</p> <p>1 A. Okay. I see it.</p> <p>2 Q. You with me?</p> <p>3 A. Yes.</p> <p>4 Q. You say: These are very, very dangerous</p> <p>5 people.</p> <p>6 A. Yes.</p> <p>7 Q. Now, what evidence do you have that my client</p> <p>8 or her father are -- are dangerous people -- very, very</p> <p>9 dangerous people?</p> <p>10 A. If the district attorney of Harris County would</p> <p>11 call someone Darth Vader, suggests that they are</p> <p>12 dangerous.</p> <p>13 Q. Is that the basis of that statement?</p> <p>14 A. (No verbal response.)</p> <p>15 Q. Anything else?</p> <p>16 A. I believe that the social conservative wing of</p> <p>17 the republican party is dangerous.</p> <p>18 Q. Okay. Anything else?</p> <p>19 A. That's it.</p> <p>20 Q. Okay. You didn't say: These are very, very</p> <p>21 conservative people, did you?</p> <p>22 A. No.</p> <p>23 Q. You said: There very, very dangerous people.</p> <p>24 They can inflict harm?</p> <p>25 MR. SIBLEY: Objection.</p>	<p style="text-align: right;">Page 44</p> <p>1 Q. Well, it's November 25, at 12:25.</p> <p>2 A. Okay. I have it now.</p> <p>3 Q. You with me?</p> <p>4 A. Yes.</p> <p>5 Q. All right. You say that -- me see.</p> <p>6 Sarah struck me -- she, Sarah, struck me</p> <p>7 as very neurotic in that state -- well, now you say</p> <p>8 she's neurotic.</p> <p>9 What evidence do you have that she's</p> <p>10 neurotic?</p> <p>11 MR. SIBLEY: Objection.</p> <p>12 A. I -- I -- I don't say that I know she's</p> <p>13 neurotic. I say, my subjective impression is that she</p> <p>14 is based upon her behavior during the confrontation and</p> <p>15 her failure to do what any responsible student would've</p> <p>16 done if they had genuine concerns about my scholarship,</p> <p>17 which is talk to me about it.</p> <p>18 Q. (BY MR. PRINGLE, JR.) Anything else that, in</p> <p>19 Point 2, that would justify your impression she's</p> <p>20 neurotic other than writing up the flyer?</p> <p>21 MR. SIBLEY: Objection.</p> <p>22 A. The contention that I'm a danger to students'</p> <p>23 safety with no evidence whatever.</p> <p>24 Q. (BY MR. PRINGLE, JR.) You go on to say --</p> <p>25 anything else?</p>
<p style="text-align: right;">Page 43</p> <p>1 A. They can inflict harm upon sexual and gender --</p> <p>2 yes.</p> <p>3 Q. (BY MR. PRINGLE, JR.) And the basis of your</p> <p>4 statement of claiming that Sarah and her father are</p> <p>5 very, very dangerous people that can inflict harm on</p> <p>6 people is based on -- is it anything other than your</p> <p>7 epistemo -- epistemological speculation?</p> <p>8 MR. SIBLEY: Objection.</p> <p>9 A. It is based upon her family's close association</p> <p>10 with Dan Patrick, who has made statements to the effect</p> <p>11 that the -- or that -- that the massacre at the gay</p> <p>12 nightclub in Orlando was people reaping what they sow.</p> <p>13 I think that is a very dangerous statement.</p> <p>14 Q. (BY MR. PRINGLE, JR.) Anything else?</p> <p>15 A. That was it.</p> <p>16 Q. Okay. Let's go to the pay -- your e-mail of</p> <p>17 Monday, November 25, 2019, 12:25.</p> <p>18 A. Uh-huh. Yes.</p> <p>19 Q. You need to turn the page a couple pages. Back</p> <p>20 towards the front.</p> <p>21 A. Well, you're not talking -- I mean, there's one</p> <p>22 on this page that's November 25th. Who was the e-mail</p> <p>23 addressed to?</p> <p>24 Q. It's addressed do David Ochsner, at 12:25 p.m.</p> <p>25 A. Oh, 12:25. Okay. Oh.</p>	<p style="text-align: right;">Page 45</p> <p>1 A. If someone thinks that ideas threaten their</p> <p>2 safety, to my mind, that is neuroticism. And</p> <p>3 particularly, if this is a female, and my ideas have to</p> <p>4 do with all male relations, how could shh -- how could</p> <p>5 that person credibly and rationally think I am a danger</p> <p>6 to them? Because, in fact, my position is that the age</p> <p>7 of consent should remain what it currently is for</p> <p>8 females.</p> <p>9 Q. Anything else?</p> <p>10 A. It's very clear from the context this is an</p> <p>11 impression.</p> <p>12 Q. Sure, and I'm just asking the basis of that</p> <p>13 impression.</p> <p>14 A. That's the basis.</p> <p>15 Q. So, No. 1, she -- she issued a flyer, handed it</p> <p>16 out; No. 2, was that she seemed very nervous; is that</p> <p>17 right?</p> <p>18 A. Yes.</p> <p>19 Q. And, No. 3, she indicated that there was -- she</p> <p>20 had concerns about students' safety, where only your</p> <p>21 ideas only affect boys and not girls, correct?</p> <p>22 A. I think that would be correct.</p> <p>23 Q. All right. You go on to say "he." I think you</p> <p>24 probably meant "she."</p> <p>25 "She not even know it yet, but she may</p>

May 25, 2021

46 to 49

<p style="text-align: right;">Page 46</p> <p>1 have acquired from him homophobic attitudes and the</p> <p>2 notion that misrepresenting people's ideas is a</p> <p>3 legitimate motus operandi."</p> <p>4 What's the basis of that statement?</p> <p>5 A. The "he" is correct. It refers to her father.</p> <p>6 Q. Oh, okay.</p> <p>7 A. Because I was genuinely uncertain whether her</p> <p>8 father knew about this in advance or not.</p> <p>9 Q. Ah. I see. But you speculate that Sarah may</p> <p>10 have acquired some sort of homophobic attitudes?</p> <p>11 A. The fact that her family continues to closely</p> <p>12 associate with Dan Patrick, who does exhibit homophobic</p> <p>13 attitudes, led me to think that was probable.</p> <p>14 Q. So, you think it's probable that Sarah has</p> <p>15 homophobic attitudes because Dan Patrick is his -- is</p> <p>16 her father's client? Is that your educated guess?</p> <p>17 MR. SIBLEY: Objection.</p> <p>18 A. My wording is "may have." That is not a</p> <p>19 statement of fact.</p> <p>20 Q. (BY MR. PRINGLE, JR.) Is that your educated</p> <p>21 guess though?</p> <p>22 A. Yes, that and the fact that she attacked me in</p> <p>23 this way, which is based on the widespread public</p> <p>24 prejudice that gay men tend to be pedophiles.</p> <p>25 Q. You would agree, would you not, sir, that a</p>	<p style="text-align: right;">Page 48</p> <p>1 allowed this to mushroom to the level that it then</p> <p>2 created violence of.</p> <p>3 Q. What was the pseudo-evidence that you suggested</p> <p>4 be taken down and buried that might be det --</p> <p>5 detrimental to you?</p> <p>6 A. Claims that I associate with pedophiles because</p> <p>7 I work with prisoners. Some of those claims were</p> <p>8 implicit in your questions.</p> <p>9 Q. Say that again.</p> <p>10 A. Claims that I associate or encourage pedophiles</p> <p>11 because I work with prisoners who are guilty of child</p> <p>12 molestation.</p> <p>13 Q. And in that regard, you do associate with</p> <p>14 pedophiles, true?</p> <p>15 A. Depends --</p> <p>16 MR. SIBLEY: Objection.</p> <p>17 A. -- what you mean by the word "associate."</p> <p>18 Q. (BY MR. PRINGLE, JR.) So, in some manner,</p> <p>19 depending on what you mean by the word "associate," you</p> <p>20 would agree with that, correct?</p> <p>21 MR. SIBLEY: Objection.</p> <p>22 A. I have listened to them. If listening means</p> <p>23 association, then we're all associating with each other</p> <p>24 in total.</p> <p>25 Q. Indeed we are, sir.</p>
<p style="text-align: right;">Page 47</p> <p>1 person can oppose sex between adults and minors and not</p> <p>2 be homophobic?</p> <p>3 A. Oh, yes. Certainly.</p> <p>4 Q. All right. And just because a person opposes</p> <p>5 sex between an adult male and a 14-year-old boy doesn't</p> <p>6 mean that they're antigay.</p> <p>7 A. I would agree with that.</p> <p>8 Q. All right.</p> <p>9 MR. SIBLEY: Ross, when you get a -- get</p> <p>10 to a stopping point, let's take a quick bathroom --</p> <p>11 MR. PRINGLE, JR.: Okay. Let me finish</p> <p>12 up. I'm -- I'm almost done with this e-mail.</p> <p>13 Q. (BY MR. PRINGLE, JR.) The next paragraph, it</p> <p>14 says: The best way to nip in the bud any claims her</p> <p>15 influential father may have is to take down all the</p> <p>16 pseudo-evidence they are citing to support their</p> <p>17 McCarthyite guilt-by-association argument.</p> <p>18 So, were you suggesting to David Ochsner</p> <p>19 that, kind of, take down any evidence that might suggest</p> <p>20 that something that would be unfavorable to you?</p> <p>21 A. I'm talking about pseudo-evidence.</p> <p>22 Q. Okay.</p> <p>23 A. And, yes, I think false claims should be nipped</p> <p>24 in the bud as soon as possible. And, I believe that the</p> <p>25 unit slowed down my response, and that is part of what</p>	<p style="text-align: right;">Page 49</p> <p>1 So, the fact that you've spent time with</p> <p>2 pedophiles and you tell their stories and you interview</p> <p>3 them and you write about them, is that some level of</p> <p>4 association with pedophiles?</p> <p>5 MR. SIBLEY: Objection.</p> <p>6 Q. (BY MR. PRINGLE, JR.) In your mind?</p> <p>7 MR. SIBLEY: Objection.</p> <p>8 A. If you use the word "associate" in a</p> <p>9 exceptionally broad way, virtually everyone who has met</p> <p>10 anyone else associates with them.</p> <p>11 Q. (BY MR. PRINGLE, JR.) Well, you --</p> <p>12 A. I mean, I have met with people who are members</p> <p>13 of the Communist party. Does that mean I am associated</p> <p>14 with the Communist party? I mean, that's what John</p> <p>15 McCarthy said about people on -- on similarly thin</p> <p>16 grounds.</p> <p>17 Q. Don't know. I'm asking you about your</p> <p>18 association with pedophiles, is a little bit more than</p> <p>19 meeting with them. It's more than meeting them, isn't</p> <p>20 it?</p> <p>21 MR. SIBLEY: Objection.</p> <p>22 A. I study them.</p> <p>23 Q. (BY MR. PRINGLE, JR.) You interview them?</p> <p>24 A. Yes.</p> <p>25 MR. SIBLEY: Objection.</p>

May 25, 2021

50 to 53

<p style="text-align: right;">Page 50</p> <p>1 Q. (BY MR. PRINGLE, JR.) And you publish their</p> <p>2 writings?</p> <p>3 MR. SIBLEY: Objection.</p> <p>4 A. In cases where I think that their writings give</p> <p>5 us some illumination about their motives. I mean, that</p> <p>6 is the only way one can really learn how to prevent</p> <p>7 crime is to understand why people commit it, and that</p> <p>8 means listening to their stories and even making them</p> <p>9 available for other researchers.</p> <p>10 MR. PRINGLE, JR.: Objection,</p> <p>11 nonresponsive.</p> <p>12 Q. (BY MR. PRINGLE, JR.) You do interview</p> <p>13 pedophiles, study them, publish their writings, and, to</p> <p>14 that degree, you associate with them, correct?</p> <p>15 MR. SIBLEY: Objection.</p> <p>16 A. Most of what you are calling "interviewing"</p> <p>17 consists of sending them surveys to fill out, and that</p> <p>18 does not involve my personally meeting them. It simply</p> <p>19 involves our collecting surveys from prisoners and</p> <p>20 publishing the results.</p> <p>21 Q. (BY MR. PRINGLE, JR.) What other</p> <p>22 pseudo-evidence were you trying that -- to get the</p> <p>23 university to bury that would -- might be detrimental to</p> <p>24 you?</p> <p>25 MR. SIBLEY: Objection.</p>	<p style="text-align: right;">Page 52</p> <p>1 A. It's like now, basically, defunct organization</p> <p>2 that existed in the 1980s and 1990s as a, kind of,</p> <p>3 support group for people with pedophilic or pederastic</p> <p>4 orientations.</p> <p>5 Q. And you're saying it's now defunct?</p> <p>6 A. It's -- basically, at present, it's just a</p> <p>7 couple of people operating a website. There is no</p> <p>8 organization, per se, from what I understand. And</p> <p>9 again, I do not know that with epistemological</p> <p>10 certainty, but I have certainly heard nothing about the</p> <p>11 organization still existing and publishing anything</p> <p>12 other than that website.</p> <p>13 Q. Who are the two people running the NAMBLA</p> <p>14 website?</p> <p>15 A. One of them's a man named Peter Herman. The</p> <p>16 other one, I don't know.</p> <p>17 Q. Herman also goes by Melzer?</p> <p>18 A. Yes.</p> <p>19 Q. And how long have you known Peter Herman, the</p> <p>20 man who's running the NAMBLA website?</p> <p>21 A. About 20 years.</p> <p>22 Q. How did you meet him?</p> <p>23 A. As part of my research, I attended two meetings</p> <p>24 of the group. Although I --</p> <p>25 Q. What group?</p>
<p style="text-align: right;">Page 51</p> <p>1 A. Well, in the first place, you'll need to look</p> <p>2 at the wording of this very closely. I say: Any</p> <p>3 pseudo -- that -- claims that her father may eventually</p> <p>4 make. And the pseudo-evidence is the kind of thing in</p> <p>5 and of the defendant's flyer and in Hollie Green's, you</p> <p>6 know, website that, you know, would quote sentences or</p> <p>7 even phrases out of context and make it appear as if</p> <p>8 they meant something different from what I meant.</p> <p>9 Q. That wasn't what I wanted to ask. I was asking</p> <p>10 about the pseudo-evidence that you asked the university</p> <p>11 to take down to nip this in the bud.</p> <p>12 MR. SIBLEY: Objection.</p> <p>13 A. By "taking down," I mean refute.</p> <p>14 Q. (BY MR. PRINGLE, JR.) Say that again.</p> <p>15 A. By "taking down," I mean refute. I do not mean</p> <p>16 they can actually, you know, censor what people put on</p> <p>17 their social media. I am meaning that we should refute</p> <p>18 it so thoroughly that no one will believe it.</p> <p>19 Q. Well, you -- didn't you ask Wikipedia to take</p> <p>20 down the notation that you were associating with NAMBLA?</p> <p>21 That's a yes or no question.</p> <p>22 A. Yes.</p> <p>23 Q. And --</p> <p>24 A. And they did.</p> <p>25 Q. And what is NAMBLA?</p>	<p style="text-align: right;">Page 53</p> <p>1 A. -- made it -- excuse me?</p> <p>2 Q. Of what group?</p> <p>3 A. NAMBLA.</p> <p>4 Q. Okay. Well, then, I'm sorry.</p> <p>5 A. And I made it clear to them that I did not</p> <p>6 share in their sexual orientation, but I wanted to</p> <p>7 understand it since I was working on pederasty in a</p> <p>8 historical and anthropological perspective. I felt it</p> <p>9 would be irresponsible not to talk to some actual</p> <p>10 pederasts, because it is not my sexual orientation and</p> <p>11 it's not the sexual orientation of anyone that I</p> <p>12 personally knew up to that point in time.</p> <p>13 And at that point of time, NAMBLA was the</p> <p>14 only organization that existed where, I thought, I could</p> <p>15 meet such people and -- and talk to them and hear why</p> <p>16 they still persist in -- in doing or wanting to do</p> <p>17 things that are punished so severely by American law.</p> <p>18 Q. So, when you met Peter -- what's his name,</p> <p>19 Melzer? What's his -- what's his other name?</p> <p>20 A. Herman.</p> <p>21 Q. Herman.</p> <p>22 Which -- which is his preferred name:</p> <p>23 Herman or Melzer?</p> <p>24 A. His legal name is Melzer.</p> <p>25 Q. Melzer. Okay.</p>

May 25, 2021

54 to 57

<p style="text-align: right;">Page 54</p> <p>1 Why does he use Herman?</p> <p>2 A. A lot of people who participated in that</p> <p>3 organization, for obvious reasons, wanted to conceal</p> <p>4 their identity.</p> <p>5 Q. What are the obvious reasons?</p> <p>6 A. That they would be accused of being sex</p> <p>7 criminals or -- or pedophiles, and that's not a good</p> <p>8 thing to be accused of in our society.</p> <p>9 Q. Well, why would simple membership in NAMBLA</p> <p>10 lead one to believe that someone be accused of being a</p> <p>11 pedophile?</p> <p>12 A. I've been accused of it just based on the fact</p> <p>13 that I had -- had some minor interactions with them.</p> <p>14 Q. I'm not asking about you. And, look, are you a</p> <p>15 member of NAMBLA?</p> <p>16 A. No.</p> <p>17 Q. Have you ever been a member of NAMBLA?</p> <p>18 A. No.</p> <p>19 Q. So, why would merely being a member of NAMBLA</p> <p>20 open ones up to being accused of being a pedophile?</p> <p>21 A. I think it obvious.</p> <p>22 Q. State it.</p> <p>23 A. Because it is a support group for people with</p> <p>24 orientations toward minors. Some of them are genuine</p> <p>25 pedophiles. Some of them are, what I would call,</p>	<p style="text-align: right;">Page 56</p> <p>1 position that there should be no age of consent. And,</p> <p>2 you know, I spoke against it. So, I -- I, you know,</p> <p>3 think that's a serious mistake, and it's one of the</p> <p>4 reasons that organization is so infamous.</p> <p>5 Q. (BY MR. PRINGLE, JR.) When was the last time</p> <p>6 you spoke to Mr. Melzer?</p> <p>7 A. Few weeks ago.</p> <p>8 Q. And what was the context of your last speaking</p> <p>9 to Mr. Melzer a few weeks ago? And this is the fellow</p> <p>10 that maintains the NAMBLA website?</p> <p>11 A. He's involved in doing it had I -- with someone</p> <p>12 else who might augment. He -- he's very interested in</p> <p>13 fighting pre-crime preventative detention. Peter Melzer</p> <p>14 is a Holocaust survivor. He's in his 80s. He spent</p> <p>15 most of his childhood in hiding in Nazi occupied</p> <p>16 Belgium. He lost his entire family to the Holocaust.</p> <p>17 And I think -- and again, this is speculation on my</p> <p>18 part -- part of the reason why he is attracted to</p> <p>19 underage people is -- has to do with his own isolation</p> <p>20 and horrible experiences during that time of hiding.</p> <p>21 But he has also told me that he has never violated the</p> <p>22 law, that he has been completely celibate in his entire</p> <p>23 life, and I believe him.</p> <p>24 Q. What evidence do you have it's true?</p> <p>25 A. I have no evidence it is untrue, and I -- I --</p>
<p style="text-align: right;">Page 55</p> <p>1 pederasts. And one of the things I learned by meeting</p> <p>2 them is that these are two very different groups of</p> <p>3 people with different personalities and outlets.</p> <p>4 Q. So, NAMBLA is a support group for adults</p> <p>5 sexually attracted to underage individuals, like</p> <p>6 children, like teenagers, correct?</p> <p>7 A. And my understanding is it also includes some</p> <p>8 underage young people or, at least, has in its history.</p> <p>9 I -- I did not meet any of them at the two meetings I</p> <p>10 attended.</p> <p>11 Q. And the two meetings you attended, when were</p> <p>12 they?</p> <p>13 A. Late 1990s, maybe 2001.</p> <p>14 Q. And did you --</p> <p>15 A. About 20 years ago.</p> <p>16 Q. And did you present at these meetings?</p> <p>17 A. Not any formal presentation, no; but, I mean, I</p> <p>18 did participate in their discussions.</p> <p>19 Q. And -- and what sort of discussions did you</p> <p>20 participate in at -- at the NAMBLA support group for</p> <p>21 minor attracted individuals?</p> <p>22 MR. SIBLEY: Objection.</p> <p>23 A. It's -- it's 20 years ago, so I -- I cannot</p> <p>24 reconstruct this with any precision, but I know there</p> <p>25 were discussions about whether they should retain their</p>	<p style="text-align: right;">Page 57</p> <p>1 I -- I -- just my personal impression of him is that he</p> <p>2 is not very sexual and not likely to be attracted to an</p> <p>3 underage person.</p> <p>4 Q. And how often do you speak to Mr. Melzer?</p> <p>5 A. Well, I've had a lot of e-mail exchanges with</p> <p>6 him over the last couple of years, because he's very</p> <p>7 interested in this issue of pre-crime preventative</p> <p>8 detention or what is sometimes called civil commitment.</p> <p>9 And this is also something that the foundation is</p> <p>10 concerned with on human rights grounds. I mean -- I</p> <p>11 mean, I -- I'm not sure if you're familiar with this</p> <p>12 system. Should I explain it?</p> <p>13 Q. You shouldn't.</p> <p>14 A. Okay.</p> <p>15 Q. You would have -- other than meeting him 20</p> <p>16 years ago at the conference -- or two conferences, I</p> <p>17 think, right?</p> <p>18 A. Yes.</p> <p>19 Q. And were the two conferences close together?</p> <p>20 A. Maybe a couple years apart.</p> <p>21 Q. Okay. Other than that, had -- how often have</p> <p>22 you seen Peter?</p> <p>23 A. A few times. I mean, there -- there was quite</p> <p>24 a long period I had no contact with him.</p> <p>25 Q. All right.</p>

May 25, 2021

58 to 61

<p style="text-align: right;">Page 58</p> <p>1 A. Maybe as much as 10 or 15 years. But, he is a</p> <p>2 friend of Mr. Percy. And when he heard about our</p> <p>3 formulating the Percy Foundation --</p> <p>4 MR. SIBLEY: Objection.</p> <p>5 A. -- to work on sexual freedom issues, including</p> <p>6 the age of consent issue, which is a sexual freedom</p> <p>7 issue, for adolescent boys, he -- he became interested</p> <p>8 in -- in knowing more about us. And, yeah, we'd been in</p> <p>9 more frequent contact since the -- since our foundation</p> <p>10 formed itself.</p> <p>11 Q. (BY MR. PRINGLE, JR.) And you said that was</p> <p>12 about 2013?</p> <p>13 A. That's when we incorporated. I mean, we didn't</p> <p>14 really operate in any very extensive way until a couple</p> <p>15 years after that.</p> <p>16 Q. All right. So, then, at least since 2015,</p> <p>17 you've had fairly frequent contact with Mr. Melzer?</p> <p>18 A. Defends how you would define "frequent."</p> <p>19 Q. Well, would you disagree with that?</p> <p>20 A. A few times a year.</p> <p>21 Q. All right. And have -- have you seen him since</p> <p>22 then? Since 2 --</p> <p>23 A. Yes.</p> <p>24 Q. -- 015?</p> <p>25 A. Yes.</p>	<p style="text-align: right;">Page 60</p> <p>1 repeal of all age of consent laws, but I'd made it clear</p> <p>2 to them and clear to other people I don't agree with</p> <p>3 that.</p> <p>4 Q. And was it -- is it your understanding that the</p> <p>5 mission statement of -- of NAMBLA was to promote and</p> <p>6 legitimize boy love?</p> <p>7 A. They would call it that.</p> <p>8 Q. What would you call it?</p> <p>9 A. And I'm not necessarily sure that they promote</p> <p>10 it. They -- they seek legal reform, but their</p> <p>11 publications also warn people, or at least at the time</p> <p>12 that I've looked at their publications, which was back</p> <p>13 at '90s, warned people very strongly against violating</p> <p>14 that. I mean, it's a diff -- it's one thing to advocate</p> <p>15 legal change; it's another thing to advocate or promote</p> <p>16 violation of existing law.</p> <p>17 And what I found in their publications</p> <p>18 were a lot of warnings about just how severe the legal</p> <p>19 penalties are, of warnings against trying to access</p> <p>20 child pornography. Because many of the websites that</p> <p>21 presume to offer it are actually sting operations by the</p> <p>22 FBI. I mean, it was actually from their publications</p> <p>23 that I learned that U.S. law has extraterritorial</p> <p>24 jurisdiction.</p> <p>25 Q. What does that mean?</p>
<p style="text-align: right;">Page 59</p> <p>1 Q. How many times have you seen him?</p> <p>2 A. Maybe three or four times.</p> <p>3 Q. Okay. And where have you seen him?</p> <p>4 A. In Boston. He -- he would sometimes come to</p> <p>5 our meetings, and I think, at least once or twice, I</p> <p>6 visited him at his home in Knockers.</p> <p>7 Q. You say "our meetings." The Percy Foundation</p> <p>8 meetings --</p> <p>9 A. Yes, our board meetings.</p> <p>10 Q. Gotcha.</p> <p>11 And does Mr. Melzer have a title with</p> <p>12 NAMBLA?</p> <p>13 A. I don't know.</p> <p>14 My impression is it's not really a very</p> <p>15 formal organization, NAMBLA.</p> <p>16 Q. Do you know what the mission statement is of</p> <p>17 NAMBLA?</p> <p>18 A. I have not looked at any of their materials</p> <p>19 since I was researching them 20-odd years ago.</p> <p>20 Q. So, is the answer to that you don't know what</p> <p>21 their mission statement is?</p> <p>22 A. Not their current statement. I probably</p> <p>23 would've known what it was 20 years ago.</p> <p>24 Q. Do you have any idea what that was?</p> <p>25 A. My understanding was that they wanted the</p>	<p style="text-align: right;">Page 61</p> <p>1 A. That if anyone goes to a foreign country, like</p> <p>2 the Philippines or Thailand -- I mean countries where</p> <p>3 there is sex tourism -- and has contact with a young</p> <p>4 person that may be legal in that country but is not</p> <p>5 legal in the state of their residence in the U.S., that</p> <p>6 is prosecutable under federal law.</p> <p>7 Q. And -- and when did you come to this</p> <p>8 realization?</p> <p>9 A. In the 1990s --</p> <p>10 Q. Okay.</p> <p>11 A. -- and -- and it was only in virtue of reading</p> <p>12 it in their publications. So, I think they do a service</p> <p>13 to that community by warning them how dangerous this is.</p> <p>14 MR. PRINGLE, JR.: Objection.</p> <p>15 You break now in?</p> <p>16 MR. SIBLEY: Yeah, just waiting for you to</p> <p>17 get to a stopping point for --</p> <p>18 MR. PRINGLE, JR.: I'd forgotten all about</p> <p>19 it.</p> <p>20 MR. SIBLEY: That's okay.</p> <p>21 THE VIDEOGRAPHER: Off the record at 2:55.</p> <p>22 (Recess from 2:55 p.m. to 3:08 p.m.)</p> <p>23 (Exhibit 5 marked)</p> <p>24 THE VIDEOGRAPHER: We're back on the</p> <p>25 record at 3:08.</p>

May 25, 2021

62 to 65

<p style="text-align: right;">Page 62</p> <p>1 MR. PRINGLE, JR.: Did I give you my</p> <p>2 highlighted copy?</p> <p>3 MR. SIBLEY: Yes, you did.</p> <p>4 MR. PRINGLE, JR.: Yeah, sorry about that.</p> <p>5 It's yours.</p> <p>6 Q. (BY MR. PRINGLE, JR.) All right. Dr. Hubbard,</p> <p>7 we're looking at Exhibit No. 5, and tell me what that</p> <p>8 is, please, sir.</p> <p>9 A. This is my article from the collection we --</p> <p>10 (audio distortion/unintelligible).</p> <p>11 THE REPORTER: I'm sorry, I can't hear</p> <p>12 you.</p> <p>13 A. This is my article in the collection Greek Love</p> <p>14 Reconsidered.</p> <p>15 Q. (BY MR. PRINGLE, JR.) And is that your</p> <p>16 handwriting on the first page of Exhibit No. 5?</p> <p>17 A. Yes.</p> <p>18 Q. Where it says "From T K Hubbard, Greek Love</p> <p>19 Reconsidered, Wallace Hamilton, 2000," correct?</p> <p>20 A. Yes.</p> <p>21 Q. Now, what is -- is there -- isn't -- is there</p> <p>22 any relationship between Wallace Hamilton and NAMBLA?</p> <p>23 A. I did not realize it at the time, but</p> <p>24 apparently it is a subsidiary of NAMBLA. I had been</p> <p>25 given the impression that it was a separate entity that</p>	<p style="text-align: right;">Page 64</p> <p>1 A. Yes, I see that.</p> <p>2 Q. And there's a citation there to a case called,</p> <p>3 Melzer versus Board of Education, correct?</p> <p>4 A. Yes.</p> <p>5 Q. Is that your friend Melzer?</p> <p>6 MR. SIBLEY: Objection.</p> <p>7 A. It is the man that I know by that name. He</p> <p>8 used to be a teacher at the New York City public school</p> <p>9 system.</p> <p>10 Q. (BY MR. PRINGLE, JR.) And what's that</p> <p>11 litigation about, Melzer versus Board of Education?</p> <p>12 MR. SIBLEY: Objection.</p> <p>13 Q. (BY MR. PRINGLE, JR.) If you know?</p> <p>14 A. My understanding is that they wanted to fire</p> <p>15 him, not based on any misbehavior with students but</p> <p>16 simply based on his membership in this organization.</p> <p>17 Q. All right. And how long have you known that?</p> <p>18 Can you just describe? Since you met him 20 years ago?</p> <p>19 A. Yes, I -- I think he did tell me then that they</p> <p>20 were trying to get rid of him and had put him into, you</p> <p>21 know, some kind of minor administrative position pending</p> <p>22 final resolution of the case.</p> <p>23 Q. Did you offer any assistance to Mr. Melzer in</p> <p>24 his lawsuit over his discharge?</p> <p>25 A. No.</p>
<p style="text-align: right;">Page 63</p> <p>1 sometimes distributed its publications to their</p> <p>2 membership. And I -- I think had I known that they were</p> <p>3 actually part of NAMBLA, per se, I might've reconsidered</p> <p>4 putting this volume together for you.</p> <p>5 Q. Why?</p> <p>6 A. Because of the kind of false inferences that</p> <p>7 have been drawn from this by the defendant and others.</p> <p>8 Q. Well, why do you think that would be something</p> <p>9 that you -- that -- that not publishing with this</p> <p>10 publishing house would address?</p> <p>11 A. Because people refer to this as something</p> <p>12 published by NAMBLA and, therefore, infer from that,</p> <p>13 that I support NAMBLA's positions or that this additive</p> <p>14 volume supports their positions, which it does not.</p> <p>15 Q. Let me go ahead and mark, as Exhibit No. 6, a</p> <p>16 document.</p> <p>17 (Exhibit 6 marked)</p> <p>18 Q. (BY MR. PRINGLE, JR.) And have you seen this</p> <p>19 United States versus Mayer before?</p> <p>20 A. No.</p> <p>21 Q. Okay. If you'll look at page 6, it says that</p> <p>22 NAMBLA functions as a support -- under -- right here, it</p> <p>23 says -- page 6 -- findings of the U.S. District Judge</p> <p>24 says that NAMBLA functions as a support network for its</p> <p>25 estimated 2-to-300 members, correct?</p>	<p style="text-align: right;">Page 65</p> <p>1 Q. The next page describes Mr. Melzer as a member</p> <p>2 of NAMBLA's steering committee, correct?</p> <p>3 A. Yes, I see that.</p> <p>4 Q. Did you know that Mr. Melzer was a member of</p> <p>5 NAMBLA's steering committee?</p> <p>6 A. Yes.</p> <p>7 Q. And when did you know that?</p> <p>8 A. When I attended the first of the two meetings I</p> <p>9 attended.</p> <p>10 Q. All right. And do you know Joseph Power?</p> <p>11 A. I met him at the second of the two meetings.</p> <p>12 Q. And who is Joseph Power?</p> <p>13 A. He was also someone involved with the</p> <p>14 organization who, I think, for a time added to their</p> <p>15 board meeting.</p> <p>16 Q. And when is the last time you spoke to Joseph</p> <p>17 Power?</p> <p>18 A. It was at that second meeting and never since</p> <p>19 then.</p> <p>20 Q. You had zero contact with Joseph Power since</p> <p>21 that second NAMBLA conference that you anticipated in</p> <p>22 about 20 years ago?</p> <p>23 A. Yes.</p> <p>24 Q. Do you know that Power is a registered sex</p> <p>25 offender?</p>

May 25, 2021

66 to 69

<p style="text-align: right;">Page 66</p> <p>1 A. I think he admitted to that when I went.</p> <p>2 Q. And this discusses a conference where the ex --</p> <p>3 conference of NAMBLA, I believe, in New York, where the</p> <p>4 attendees were told to say they were with the Wallace</p> <p>5 Hamilton Press. Did you know that?</p> <p>6 A. I did not attend that conference.</p> <p>7 Q. Did you know that Wallace Hamilton Press was</p> <p>8 used as a cover organization for NAMBLA?</p> <p>9 A. I have since learned that.</p> <p>10 Q. But --</p> <p>11 A. But I did not know it at the time that we</p> <p>12 conceived the bulk contract.</p> <p>13 Q. And when did you learn that Wallace Hamilton</p> <p>14 Press was a cover operation for NAMBLA?</p> <p>15 A. I think it was something in the documents that</p> <p>16 we had from you in response to our complaint. I -- I</p> <p>17 think you quoted something from the Curly case.</p> <p>18 Q. At the time of the flyer, did you know that</p> <p>19 Wallace Hamilton Press was a cover organization for</p> <p>20 NAMBLA?</p> <p>21 A. No.</p> <p>22 Q. But you know that now?</p> <p>23 A. I do now.</p> <p>24 Q. Okay. And what does NAMBLA stand for?</p> <p>25 A. North American Man Boy Love Association.</p>	<p style="text-align: right;">Page 68</p> <p>1 else.</p> <p>2 Q. And you say: Our past is now something we can</p> <p>3 smugly congratulate ourselves from having transcended</p> <p>4 and forgotten.</p> <p>5 A. Yes.</p> <p>6 Q. And by "the past," we're smugly congratulating</p> <p>7 ourselves on the past of pre-pederasty, correct?</p> <p>8 A. I -- I would say the past, generally, is under</p> <p>9 attack on almost all issues. I mean, just look at the</p> <p>10 cancellation of -- of -- of school names and statues. I</p> <p>11 mean, even statues of -- of people like Lincoln and the</p> <p>12 the Founding Fathers of the country are being attacked</p> <p>13 by people.</p> <p>14 American history is being described as</p> <p>15 being pervasively racist, and, you know, based on</p> <p>16 inequality. And -- and, I mean, if anything, this was</p> <p>17 prescient in -- in -- in that that attack on that</p> <p>18 presentist attack, assuming that we're superior to ages</p> <p>19 of the past has reached even new extremes today; but it</p> <p>20 was already starting, you know, decades ago.</p> <p>21 Q. So, you're questioning, then, whether we are,</p> <p>22 in deed, superior to the past in the days of Greek</p> <p>23 pederasty, correct?</p> <p>24 A. Yes.</p> <p>25 Q. Okay. And you question whether or not we are</p>
<p style="text-align: right;">Page 67</p> <p>1 Q. Okay. We're through with Exhibit 6 for a</p> <p>2 while.</p> <p>3 I want to ask you about this sentence on</p> <p>4 page 2 of your -- of your article. And before I do</p> <p>5 that, what was the purpose of your article?</p> <p>6 A. To show that pederasty's incompatible with</p> <p>7 democracy, and that is not necessarily something that</p> <p>8 would be welcome to NAMBLA, but I nevertheless felt it</p> <p>9 needed to be emphasized.</p> <p>10 Q. You say, on page 2, "Greed pederasty has been</p> <p>11 transformed into a institutional power dynamic that</p> <p>12 exploits boys no differently from women and slaves."</p> <p>13 A. Yes.</p> <p>14 Q. Is that true?</p> <p>15 A. Oh, yes. I think in -- in some scholarly</p> <p>16 writing, in the 1990s, such as the chapter of David</p> <p>17 Halperin that I quote from: Boys are analyzed to women</p> <p>18 and slaves and other subaltern populations.</p> <p>19 Q. And you say: That's no model for the</p> <p>20 enlightened self-accepting days of late 20th Century</p> <p>21 late -- liberal bourgeois society.</p> <p>22 What do you mean that -- by that?</p> <p>23 A. Contemporary gay society is much more oriented</p> <p>24 to equal relationships between men and women of equal</p> <p>25 age, of equal wealth, of equal education, everything</p>	<p style="text-align: right;">Page 69</p> <p>1 better than that?</p> <p>2 A. I think, for gay oriented boys, we are probably</p> <p>3 not as free as ancient Greece was.</p> <p>4 Q. By that, gay oriented boys cannot freely have</p> <p>5 sex with adult men, correct?</p> <p>6 A. Yes.</p> <p>7 Q. Okay. And in that way, do you lament the</p> <p>8 freedom that occurred in in -- in ancient Greece?</p> <p>9 A. Do I lament the freedom?</p> <p>10 Q. Yeah.</p> <p>11 A. I'm a Libertarian. Philosophically, I -- I</p> <p>12 support any freedom that does not harm other people.</p> <p>13 Q. So, you -- do you support, then, the freedom of</p> <p>14 gay-oriented boys having sex with adult men?</p> <p>15 A. If it is legal for them to do so, I think it</p> <p>16 should be their choice, as it is in Germany, Italy,</p> <p>17 Austria, South Korea, any number of advanced countries</p> <p>18 like this.</p> <p>19 Q. And do you think that ages of consent in those</p> <p>20 countries, that the United States should adopt those</p> <p>21 lower ages of consent?</p> <p>22 A. Yes, for boys only; not for girls.</p> <p>23 Q. Okay.</p> <p>24 A. And this is based -- and I said it in my</p> <p>25 publications -- on the psychological data that show that</p>

May 25, 2021

70 to 73

<p style="text-align: right;">Page 70</p> <p>1 more boys feel they benefited from relationships with</p> <p>2 adults than feel they were harmed, and that is true both</p> <p>3 of heterosexual boys having affairs with women and gay</p> <p>4 boys who are seeking a more experienced role model.</p> <p>5 Q. Are you aware of any studies of heterosexual</p> <p>6 boys who had homosexual relations with adult men?</p> <p>7 A. Oh, yes.</p> <p>8 Q. And -- and -- and what's the study on that?</p> <p>9 A. I -- I can't cite it off the top of my head.</p> <p>10 Q. It's not the Rind study, is it?</p> <p>11 A. That may've been included. I mean, the Rind</p> <p>12 study was a meta analysis. The -- reanalyzed over 20</p> <p>13 previous studies, and it is certainly possible some of</p> <p>14 those studies that he was basing it on did include the</p> <p>15 category of straight-oriented boy who experimented with</p> <p>16 sexual relationships. Many of these studies also</p> <p>17 distinguished between coercive and noncoercive</p> <p>18 relationships. Coercive relationships, by a very large</p> <p>19 margin, had more negative outcomes.</p> <p>20 Q. Including coercive relationships, were the</p> <p>21 voices yes?</p> <p>22 A. I think that's a contradiction in terms.</p> <p>23 Q. So, to your way of thinking then, adult</p> <p>24 relations between an adult man and underage boy, if the</p> <p>25 boy says "yes" cannot, by definition, be coercive?</p>	<p style="text-align: right;">Page 72</p> <p>1 A. What the data -- you're talking about</p> <p>2 specifically heterosexual boys?</p> <p>3 Q. Heterosexual boys who are manipulated into a</p> <p>4 sexual relationship by an adult male.</p> <p>5 A. Yes, if there is manipulation, such as is</p> <p>6 involved in a supervisory relationship, or a</p> <p>7 relationship where a boy is given drugs, which is often</p> <p>8 one of the ways that, you know, child molesters will</p> <p>9 procure sex from boys; but those are overwhelmingly</p> <p>10 harmful.</p> <p>11 Q. Any sexual relationship between a 14-year-old</p> <p>12 boy and adult male where the adult male has power over</p> <p>13 the boy is inherently harmful, isn't it?</p> <p>14 A. I would agree.</p> <p>15 Q. And what situation does an adult male not have</p> <p>16 power over a 14-year-old boy?</p> <p>17 A. If they are not in a supervisory position and,</p> <p>18 ordinarily, some anonymous person that they met, whether</p> <p>19 in a public park or through the internet, I -- I fail to</p> <p>20 see how they have a power relationship.</p> <p>21 Q. So, an adult male, 25 years old, goes into a</p> <p>22 restroom, finds a 14-year-old boy, didn't know him</p> <p>23 before --</p> <p>24 A. Uh-huh.</p> <p>25 Q. -- convinces him to have sex, not manipulative?</p>
<p style="text-align: right;">Page 71</p> <p>1 A. They can be manipulative, but I would not use</p> <p>2 the term coercive, no.</p> <p>3 Q. All right. Let's use the word "manipulative."</p> <p>4 Do you have any studies of -- you know, access to any</p> <p>5 studies where adult men manipulated young boys into a</p> <p>6 sexual relationship?</p> <p>7 A. Yes, there have been some studies, including,</p> <p>8 you know, those that we have done of -- of prisoners, at</p> <p>9 the Percy Foundation, in which we asked them about their</p> <p>10 childhood experiences and whether they had included</p> <p>11 contact with adults and whether that contact was</p> <p>12 something initiated by the adult or initiated by them,</p> <p>13 whether it was coercive or whether it was mutually</p> <p>14 desired. We -- we have been compiling and analyzing</p> <p>15 that information based on the study of over a thousand</p> <p>16 prisoners.</p> <p>17 Q. Have you ever conducted a study on a</p> <p>18 14-year-old heterosexual boys to figure out how they</p> <p>19 feel about it?</p> <p>20 A. Not sex --</p> <p>21 Q. Sex with an adult men?</p> <p>22 A. Not specifically.</p> <p>23 Q. Do you have any idea what their response might</p> <p>24 be? Do you think it would be mutually beneficial for</p> <p>25 those boys?</p>	<p style="text-align: right;">Page 73</p> <p>1 There's no power dynamic there?</p> <p>2 A. It depends how the convincing took place.</p> <p>3 Q. How do we know?</p> <p>4 A. From the testimony of -- of the boy.</p> <p>5 Q. But you've never talked to a boy, have you?</p> <p>6 A. I have certainly talked to a great number of</p> <p>7 gay men who were sexually active as boys with adults.</p> <p>8 Q. And you're relying upon their memory --</p> <p>9 A. Yes.</p> <p>10 Q. -- and the filter of how they remembered things</p> <p>11 when they were a little boy, don't you?</p> <p>12 A. Yes, but they -- they -- I mean, people tend to</p> <p>13 have very exact memories of their first sexual</p> <p>14 experience.</p> <p>15 Q. And you're also depending upon these men -- and</p> <p>16 they're by and large incarcerated?</p> <p>17 A. No. I mean, when I'm talking about the --</p> <p>18 well, I mean some of those that we have examined in our</p> <p>19 surveys would be incarcerated people, but quite separate</p> <p>20 from that, I have a number of veins, including some of</p> <p>21 the people involved with the foundation who say that, as</p> <p>22 adolescent boys, they quite willingly had relationships</p> <p>23 with men who were of adult age and -- and enjoyed those</p> <p>24 relationships and felt that they were very helpful in</p> <p>25 coming out and establishing their identity and making</p>

May 25, 2021

74 to 77

<p style="text-align: right;">Page 74</p> <p>1 their way in life.</p> <p>2 Q. So, let's break that down a little bit. A lot</p> <p>3 of the people that you talked to and rely upon for your</p> <p>4 research are convicted felons, the prisoners?</p> <p>5 A. And that is certainly one of the strands of</p> <p>6 evidence that we looked at.</p> <p>7 Q. And, of course, you rely upon their</p> <p>8 creditability and their truth telling as convicted</p> <p>9 felons, don't you?</p> <p>10 A. Yes.</p> <p>11 Q. Okay. But you really can't do anything to</p> <p>12 verify the accuracy of those claims, can you? Gotta let</p> <p>13 it go.</p> <p>14 A. In any kind of survey, we always have to rely</p> <p>15 on the credibility of the people who fill out the</p> <p>16 survey. That's just inherent in -- in, you know, the</p> <p>17 methodology of doing survey work.</p> <p>18 Q. And -- but you've never analyzed the effect of</p> <p>19 pederastic relations between a 14-year-old heterosexual</p> <p>20 boy and an adult male, have you?</p> <p>21 A. Not specifically, no.</p> <p>22 Q. Not generally either?</p> <p>23 A. We ask broader questions than that. In our</p> <p>24 surveys, we ask: What was the age of your first</p> <p>25 experience? We ask questions: What is your present</p>	<p style="text-align: right;">Page 76</p> <p>1 well be heterosexual.</p> <p>2 Q. My question to you, though, is, you have not</p> <p>3 done any specific research on the effect of adult male</p> <p>4 on underage male pederasty where the underage male is</p> <p>5 heterosexual?</p> <p>6 A. It's certainly included in our broader analysis</p> <p>7 of -- of the prisoner data, because most of them are</p> <p>8 heterosexual and were heterosexual, and a good many of</p> <p>9 them -- I mean not all of them, but a good many were</p> <p>10 molested as children. I mean, we ask all kinds of</p> <p>11 questions. We ask psychological profile questions. We</p> <p>12 ask about the nature of their crime. We ask about the</p> <p>13 age of their first experience, the age of the person</p> <p>14 they had it with, whether it was incest, how they came</p> <p>15 to be acquainted with that person. I mean, our --</p> <p>16 our -- our -- our survey had 118 questions in it.</p> <p>17 Q. Okay. You say here, in Greek Love</p> <p>18 Reconsidered, published by this Wallace Hamilton outfit.</p> <p>19 What -- it said, "Whereas in England, the homosexual</p> <p>20 move --"</p> <p>21 A. Well, what page?</p> <p>22 Q. I'm on page 4.</p> <p>23 A. Oh. Okay.</p> <p>24 Q. First full paragraph.</p> <p>25 A. Uh-huh.</p>
<p style="text-align: right;">Page 75</p> <p>1 sexual orientation? Was the first experience, in your</p> <p>2 judgment, manipulative, or coercive, or was it mutually</p> <p>3 embraced, or were you the one who initiated it?</p> <p>4 Q. And these are questions that you're asking of</p> <p>5 convicted sex offenders?</p> <p>6 A. Not all of the people in our surveys are sex</p> <p>7 offenders, but, I mean, we don't discriminate, in terms</p> <p>8 of who we allow into our book program.</p> <p>9 Q. Well, not all of them are sex offenders, but</p> <p>10 the vast majority are?</p> <p>11 A. I would say it's more like 60 percent.</p> <p>12 Q. All right. Sixty percent of the people in your</p> <p>13 academic research are convicted sex offenders who say</p> <p>14 that they had a positive experience, their first</p> <p>15 experience with an adult partner?</p> <p>16 A. No, not all of them say that. Some of them say</p> <p>17 it was very negative.</p> <p>18 Q. But in terms of any sort of analysis on the</p> <p>19 effect of pederasty on 14-year-old heterosexual boys,</p> <p>20 you've done no research on that, have you?</p> <p>21 A. Well, yes, we have, because many of the people</p> <p>22 filling out our surveys are of heterosexual orientation.</p> <p>23 I mean not all sex offenders are gay. The vast majority</p> <p>24 of them are heterosexual, and their offenses were with</p> <p>25 girls, or accessing child pornography of which might</p>	<p style="text-align: right;">Page 77</p> <p>1 Q. It says, "Whereas in England, the homosexual</p> <p>2 movement was entirely -- almost entirely an intellectual</p> <p>3 and literary phenomenon."</p> <p>4 What does that mean exactly?</p> <p>5 A. We're talking here about the late 19th Century</p> <p>6 and the first couple of decades of the 20th Century.</p> <p>7 Yes, it was, by and large, poets and artists, like Oscar</p> <p>8 Wilde. They -- they called themselves The Uranians,</p> <p>9 after the Uranian love that -- that is described in</p> <p>10 Plato's Symposium.</p> <p>11 Q. Sir, are you saying there that in the late 19th</p> <p>12 and earlieth -- early 20th Century, in England, most</p> <p>13 homosexuals were intellectuals and literary?</p> <p>14 A. No, I'm not saying that, but I'm saying that</p> <p>15 the people who talk about it; not the people of whom</p> <p>16 there is record.</p> <p>17 Q. Okay. Let's go to page 5, which is on the</p> <p>18 other side of that --</p> <p>19 A. Yeah.</p> <p>20 Q. -- last page. You talk about modern</p> <p>21 scholarship on Greek pederasty is generally considered</p> <p>22 to begin with Dover's Greek Homosexuality?</p> <p>23 A. Uh-huh.</p> <p>24 Q. Let me see. And, just generally, do you agree</p> <p>25 or disagree with Dover's conclusions or research --</p>

May 25, 2021

78 to 81

<p style="text-align: right;">Page 78</p> <p>1 A. I agree --</p> <p>2 MR. SIBLEY: Objection.</p> <p>3 A. -- with some of them; I disagree with others.</p> <p>4 Q. (BY MR. PRINGLE, JR.) All right.</p> <p>5 A. I mean, I -- I -- I've met, Sir Kenneth Dover.</p> <p>6 I've met his wife. He is very much a heterosexual, and</p> <p>7 he even says, in the preface of his book, that the</p> <p>8 framework within which he's considering these questions</p> <p>9 are the mores of the period when he grew up in the</p> <p>10 1930s, based on his experience with women.</p> <p>11 Q. You used two words: Erastés and erômenos.</p> <p>12 What do -- what does that mean?</p> <p>13 A. Oh. These are Greek words. Erastés means the</p> <p>14 lover. Erômenos is the passive participle, meaning the</p> <p>15 one who is loved.</p> <p>16 Q. What's the distinction between those two?</p> <p>17 A. The erastés is generally, although not always,</p> <p>18 older. And the one who is loved is -- is younger. But,</p> <p>19 it -- I mean, one of the thrusts of my scholarship --</p> <p>20 and I think one of the principal original contributions</p> <p>21 I have made -- is to show that age equal homosexuality,</p> <p>22 particularly among young men who are not yet at the age</p> <p>23 of marriage, was quite common in Greece. And again,</p> <p>24 that's not necessarily something that -- that</p> <p>25 pedophiles, as we call them, would want to hear.</p>	<p style="text-align: right;">Page 80</p> <p>1 such terms at the end of a decade that discovered</p> <p>2 child -- quote, child abuse, closed quote, as a</p> <p>3 supposedly pervasive phenomenon in American society.</p> <p>4 What do you mean by that?</p> <p>5 A. We're -- I mean, we're -- we're referring here</p> <p>6 to people, like Halperin and David Zinn writing in the</p> <p>7 1990s, and the decade that preceded that were the 1980s,</p> <p>8 which were a time of extreme moral panic. This is when</p> <p>9 we got things like the day care abuse scandals, like the</p> <p>10 McMartin Preschool. It's when we had all of these</p> <p>11 sensationalist media accounts of ritualized satanic</p> <p>12 abuse, you know, that all the prominent citizens of --</p> <p>13 of some small town, including the preachers and the</p> <p>14 judges and the doctors, were all part of some conspiracy</p> <p>15 to abuse children. It's -- it's the decade in which we</p> <p>16 had charges of parents molesting their own children.</p> <p>17 I mean, I can recognize at the University</p> <p>18 of Minnesota is when the famous witch hunt of Jordan</p> <p>19 County, Minnesota occurred, in which an out-of-control</p> <p>20 district attorney manipulated children to denounce their</p> <p>21 parents for having molested them. And then later on</p> <p>22 when the kids became adult, they admitted that none of</p> <p>23 this ever happened. And almost all of those infamous</p> <p>24 sensational media cases of the '80s have since been</p> <p>25 debunked.</p>
<p style="text-align: right;">Page 79</p> <p>1 Q. Am I correct -- and I've read some of your</p> <p>2 writings -- that the erastés is the penetrating partner</p> <p>3 and erômenos is the receiving partner?</p> <p>4 A. That is what is assumed by David Halperin and</p> <p>5 others, but --</p> <p>6 Q. Not you?</p> <p>7 A. Not necessarily. I mean, we -- honestly, we</p> <p>8 don't know what people actually did. It's -- it</p> <p>9 generally inferred from the Voss painting that, yes,</p> <p>10 the -- the older one is the one who penetrates, but the</p> <p>11 penetration we're talking about is interfemoral, not --</p> <p>12 Q. What does that mean?</p> <p>13 A. Between the thighs.</p> <p>14 It is not penetration of the anus or the</p> <p>15 mouth. That is almost never represented between an</p> <p>16 adult and a boy. Anal penetration is represented in</p> <p>17 some representations of two age equal partners, whether</p> <p>18 adult or a female.</p> <p>19 Q. Moving on. You say here -- and I -- I'm</p> <p>20 reading from this portion of that paragraph right here.</p> <p>21 A. Uh-huh.</p> <p>22 Q. It's somewhere in there.</p> <p>23 A. Uh-huh.</p> <p>24 Q. It says, "It should not surprise us to find an</p> <p>25 American academic choosing to read Greek pederasty in</p>	<p style="text-align: right;">Page 81</p> <p>1 I mean, here, in Texas, we have the famous</p> <p>2 case of the San Antonio four. Those four lesbians</p> <p>3 who -- who were accused of molesting their own children.</p> <p>4 In addition, in -- in the late 1970s, we had Anita</p> <p>5 Bryant and her Save Our Children campaign that, you</p> <p>6 know, resisted gay rights, generally, with the</p> <p>7 contention that -- that almost all gays are pedophiles.</p> <p>8 That the late '70s are when we had Senator</p> <p>9 John Briggs ballot initiative in California, that any</p> <p>10 teacher who was openly gay or even any teacher who</p> <p>11 advocated gay rights would have to be fired. And in</p> <p>12 large part due to the opposition of Ronald Reagan, that</p> <p>13 initiative fortunately failed.</p> <p>14 Q. You don't disagree that child abuse -- well,</p> <p>15 maybe you do. Is child abuse a pervasive phenomenon in</p> <p>16 American society?</p> <p>17 A. The actual social science data on that is</p> <p>18 that -- if we're talking about child sexual abuse, that</p> <p>19 it probably occurs in -- that it's actually quite rare,</p> <p>20 and it depends how you define child sexual abuse. I do</p> <p>21 not define it as abuse if it is something that the young</p> <p>22 person does consensually and -- and with a partner who</p> <p>23 is not in any way manipulating them or offering them</p> <p>24 special rewards for it.</p> <p>25 Q. Regardless of the ages involved?</p>

May 25, 2021

82 to 85

<p style="text-align: right;">Page 82</p> <p>1 A. Well, I do think it should be termed child</p> <p>2 abuse if it is under the age of puberty.</p> <p>3 Q. Which is what?</p> <p>4 A. Fourteen for males, 13 for females; although,</p> <p>5 actually, the biological evidence has been showing that</p> <p>6 it has been steady declining.</p> <p>7 Q. So, as long as the 14-year-old boy consents to</p> <p>8 sexual -- sexual result -- sexual conduct with an -- an</p> <p>9 adult, you don't think that's child abuse?</p> <p>10 A. And as long as there is no relationship of</p> <p>11 supervision or manipulation.</p> <p>12 Q. Okay. You say --</p> <p>13 A. I would call it intergenerational, but not</p> <p>14 abusive.</p> <p>15 Q. Would you call it inappropriate? I think you</p> <p>16 said that earlier.</p> <p>17 A. Inappropriate where it is illegal.</p> <p>18 Q. Okay.</p> <p>19 "Halperin strongly negative portrayal of</p> <p>20 Greek pederasty coincided with a systematic strategy of</p> <p>21 mainline assimilationist gay rights organization to</p> <p>22 marginalize consideration of youth sexuality or reform</p> <p>23 an age-of-consent laws."</p> <p>24 A. Yes.</p> <p>25 Q. So, you think that the -- the mainline gay</p>	<p style="text-align: right;">Page 84</p> <p>1 Q. You're not -- are you a social scientist?</p> <p>2 A. No, but my foundation does a great deal of work</p> <p>3 with social sciences.</p> <p>4 Q. All right.</p> <p>5 A. And I would also say Ann is a historian.</p> <p>6 History is very social scientific. It -- in fact, the</p> <p>7 liberal arts, generally, are very interdisciplinary, and</p> <p>8 I -- I have read a great deal of the psychological and</p> <p>9 sociological and anthropological literature on this</p> <p>10 specific question, because particularly when you're</p> <p>11 talking about social history, which is what sex history</p> <p>12 is, social science methods are very relevant.</p> <p>13 Q. And you point out that pederasty in Ancient</p> <p>14 Rome or Ancient Greece, I should say, also fell out of</p> <p>15 favor Athens, correct?</p> <p>16 A. Yes, as Athens became more democratic.</p> <p>17 Q. Okay.</p> <p>18 A. And this is part of the argument that pederasty</p> <p>19 fundamentally doesn't fit into democratic society,</p> <p>20 including our democratic society. I mean, this is not</p> <p>21 necessarily a message that would be welcomed in NAMBLA.</p> <p>22 Q. Well, you do say that traditional man/boy love</p> <p>23 was put on the defensive.</p> <p>24 A. Yes.</p> <p>25 Q. All right. And you point out, on page 8, a</p>
<p style="text-align: right;">Page 83</p> <p>1 rights organization GLAD and the other that you</p> <p>2 mentioned are trying to mainline and assimilate gay</p> <p>3 rights?</p> <p>4 A. Oh, yes, very much so.</p> <p>5 Q. Okay. And -- and as opposed to that, what's --</p> <p>6 what's the counterpart to that, that it's</p> <p>7 assimilationist?</p> <p>8 A. The origins of the gay rights movement, in the</p> <p>9 late '60s and 1970s, were based on offering a radical</p> <p>10 alternative to mainline middle class respectable family</p> <p>11 life and offering an alternative to the nuclear family.</p> <p>12 And although I certainly do not support doing away with</p> <p>13 the nuclear family, like Black Lives Matter does, I -- I</p> <p>14 do think that people who don't want to be in that kind</p> <p>15 of family should have that alternative.</p> <p>16 Q. And do you think that that assimilationist</p> <p>17 presents to the public this unthreatening plain vanilla</p> <p>18 image of gays and lesbians as dull, middle age with</p> <p>19 middle class bland canil -- careers and marriages just</p> <p>20 like everybody else?</p> <p>21 A. Yes.</p> <p>22 Q. Okay. And you -- and -- and your position is,</p> <p>23 we should consider the youth sexuality and what the</p> <p>24 youth wants?</p> <p>25 A. Yes.</p>	<p style="text-align: right;">Page 85</p> <p>1 pederastic relationship which gave ride -- gave rise to</p> <p>2 the boy's suicide?</p> <p>3 A. Oh, yes. That's the myth of Laius and</p> <p>4 Chrysippus, which I subsequently wrote a much longer</p> <p>5 scholarly article about.</p> <p>6 Q. Okay. So, you would agree, then, that sexual</p> <p>7 relations between men and boys can have a downside?</p> <p>8 A. Oh, certainly. But in the myth of Laius and</p> <p>9 Chrysippus, we're talking about rape, that the boy</p> <p>10 strongly resisted. And, you know, according to</p> <p>11 Euripides' version of the myth, the -- the -- the boy</p> <p>12 did -- was so ashamed of what happened, that he</p> <p>13 committed suicide.</p> <p>14 And I would mention that the man who</p> <p>15 committed the rape, the future King Laius, was the</p> <p>16 father of Oedipus. And if you know the Oedipus story,</p> <p>17 you know that Laius got punished rather severely for his</p> <p>18 sexual incontinence.</p> <p>19 Q. Why would the boy be ashamed?</p> <p>20 A. Rape victims often feel shame, and -- and</p> <p>21 particularly a male rape victim. I -- I -- I would say</p> <p>22 that male rape victims -- and there is social science</p> <p>23 behind this -- are more reluctant to report it and are</p> <p>24 less likely to be believed than female rape victims.</p> <p>25 Q. And you know why that is?</p>

May 25, 2021

86 to 89

Page 86

1 A. Because it conflicts with their sense of
 2 masculinity. I mean, men are supposed to be strong and
 3 assertive, and the idea of a man being sexually violated
 4 by another man is -- is appalling to them.

5 Q. Even if the young man gives consent?

6 A. Well, consent and violation do not go together.
 7 I define violation as forcible rape.

8 Q. You wouldn't define violation as an older man
 9 persuading a younger man to have sex, would you?

10 MR. SIBLEY: Objection.

11 A. It -- it depends on the details of the case and
 12 just what the persuasion consisted of.

13 Q. (BY MR. PRINGLE, JR.) And on page 10, you talk
 14 about Socrates?

15 A. Yes.

16 Q. You say, Socrate -- later, in the Symposium,
 17 Socrates presents physical attraction to a beautiful
 18 object, such as a boy, as merely the first and lowest
 19 step in a ladder of erotic relations.

20 A. Yes.

21 Q. So, Socrates suggests that attraction to a boy
 22 is the first and lowest step in a ladder of erotic
 23 relations?

24 A. Yes. It's -- it's called the "Ladder of Love,"
 25 because he uses the "ladder" metaphor. And the primary

Page 87

1 romantic form of love and sex in Ancient Greece was
 2 pederasty. Heterosexual marriages were by and large
 3 arranged marriages that were economic relationships
 4 between family. So -- so they -- they had relatively
 5 little to do with erotic attraction.

6 And, you know, consensual pederasty, well,
 7 was considered to be more accept -- well, more
 8 respective of mutuality than, say, a relationship with a
 9 prostitute or a slave.

10 Q. You're not saying that Socrates endorsed sexual
 11 relations between adults and boys, are you?

12 A. No, he did not. In fact, in Xenophon
 13 Symposium, we -- we have him trying to dissuade the
 14 young men, under his influence, from having physical
 15 relationships with boys. He saw nothing wrong with
 16 close friendships.

17 But, you see, Socrates generally
 18 considered physical love to be the lowest step.
 19 Superior -- in fact, he -- he said that obsession with
 20 one boy is the lowest step. Attraction to multiple boys
 21 of good character is the second step. Beautiful
 22 teaching or beautiful works of art would be the third
 23 step in -- in -- in one's erotic appreciation of
 24 beauty -- or beau -- or -- or, you know, law giving or
 25 other things that were socially productive. And this

Page 88

1 really needs to be contextualized, not as the opinion of
 2 the historical Socrates but Plato's -- things that Plato
 3 attributes to Socrates.

4 Q. But Socrates doesn't present physical
 5 attraction to a boy as the first and lowest step in a
 6 ladder of erotic relations, does he?

7 A. Yes --

8 Q. He does?

9 A. -- he does. Yeah, at least as articulated
 10 within Plato's Symposium.

11 Q. Huh.

12 A. Read it.

13 Q. I have.

14 A. Read it again.

15 Q. I just maybe come to a different conclusion.
 16 So, any pederastic tradition, then,
 17 continues in Plato who drops all pretense of defending
 18 pederasty as chase love and dismisses it as unnecessary
 19 and unnatural, correct?

20 A. Plato was generally hostile to all physical
 21 relations for any purpose other than reproduction. I
 22 mean, Plato, and much of Greek philosophy, is very
 23 distrustful of appetites and emotions.

24 Q. You go on to say that pederasty -- and that's
 25 the last sentence in that paragraph.

Page 89

1 Pederasty is an institution -- that's
 2 fundamentally foreign to Athens radicalized democracy
 3 but associated with a more disciplined and arguably
 4 better governed societies elsewhere.

5 A. Okay. That's in the context of Plato's laws --

6 Q. Okay.

7 A. -- which were a late work that --

8 Q. That's not your opinion then?

9 A. Oh, no. No. No. No.

10 Q. Okay.

11 A. We're talking here about of Plato's view and --
 12 and -- well, and the view of Ancient Greeks.

13 Q. You say, "Plato and other fourth century
 14 intellectuals unwittingly promoted a conceptual matrix
 15 in which all physical love of boys --"

16 A. Oh. Let me -- what paragraph?

17 Q. I'm at the bottom of page 10.

18 A. Uh-huh. Okay. I see it.

19 Q. "Plato and other fourth Century intellectuals
 20 unwittingly promoted a conceptual matrix."

21 What does that mean? I don't know what
 22 "conceptual matrix" is.

23 A. You know what a concept is?

24 Q. Don't know --

25 A. Do you know what a matrix is?

May 25, 2021

90 to 93

<p style="text-align: right;">Page 90</p> <p>1 Q. I don't know what a conceptual matrix is.</p> <p>2 Educate me.</p> <p>3 A. An array of concepts that relate to each other.</p> <p>4 Q. Okay.</p> <p>5 "More to conceptual matrix in which all</p> <p>6 physical love of boys came to be only physical love."</p> <p>7 What does that mean?</p> <p>8 A. In which this would be considered dichotomists</p> <p>9 were separated from love of character or other -- other</p> <p>10 forms of love. I mean, again, Plato was very</p> <p>11 distrustful of appetites and sensations.</p> <p>12 Q. So, "all physical love of boys came to be only</p> <p>13 physical love"; what does that mean?</p> <p>14 A. That it would -- that -- that he believed it as</p> <p>15 something that was not necessary to have a love</p> <p>16 relationship that was based on character and mutual</p> <p>17 devotion.</p> <p>18 Q. The next --</p> <p>19 A. In other words, that -- that, to his concept,</p> <p>20 sex was just sex and -- and, you know, shouldn't be</p> <p>21 confused with other things.</p> <p>22 Q. "Similarly, the man/boy love that was</p> <p>23 acknowledged and even celebrated by early homosexual</p> <p>24 activists has been marginalized within our own</p> <p>25 progressively democratic and homogenized susta --</p>	<p style="text-align: right;">Page 92</p> <p>1 "perverts" and "child molesters" in quotes?</p> <p>2 A. Because I don't think that all relationships</p> <p>3 between a young man and a adolescent are necessarily</p> <p>4 perversion and molestation as the evidence, you know,</p> <p>5 shows from those countries or sex relations are --</p> <p>6 are -- are legal and -- and seen to be un --</p> <p>7 unproblematic, you know, such as Germany and some of the</p> <p>8 other countries that we mentioned. In fact, what the</p> <p>9 social science evidence shows is that adolescent mental</p> <p>10 health is actually better in those times.</p> <p>11 Q. So, the man/boy love that was acknowledged and</p> <p>12 celebrated by earlier homosexual activists, you would</p> <p>13 agree, is sometime the province of perverts and child</p> <p>14 molesters?</p> <p>15 A. Oh, yes. I mean, there are certainly some men</p> <p>16 who do take advantage and manipulate or even coerced</p> <p>17 their -- and, yes, that -- that, I think, is quite</p> <p>18 properly legally punished.</p> <p>19 Q. And then you criticize the squeamishness and</p> <p>20 timidity of gay intellectuals that made them tacit</p> <p>21 collaborators in this myth that man/boy love is isolated</p> <p>22 as the province of perverts?</p> <p>23 A. I don't think I used the word "myth," do I?</p> <p>24 Q. No.</p> <p>25 A. You're inferring that. No, I don't use that.</p>
<p style="text-align: right;">Page 91</p> <p>1 society."</p> <p>2 Is that a negative critique?</p> <p>3 "Isolated as a province of pervert in</p> <p>4 child molesters."</p> <p>5 A. Plato uses a statement that, relative to the</p> <p>6 origins of the gay rights movement in late 19th and</p> <p>7 early 20th Century Germany and England, where -- where</p> <p>8 pederasty was very much identified as the dominant form.</p> <p>9 In -- in modern gay discourse, it is marginalized.</p> <p>10 It's -- it's -- it's not what they want to talk about.</p> <p>11 And -- and, no, I'm -- no, I think, saying that it's all</p> <p>12 the work of perverts and child molesters is a -- an</p> <p>13 exaggerated -- uh-huh. But that does not mean that I'm</p> <p>14 necessarily advocating it or promoting it in modern</p> <p>15 society as the defendant alleged.</p> <p>16 Q. You just say that the man-boy love that was</p> <p>17 celebrated by earlier activists has been marginalized</p> <p>18 with our own progressively democratic and homogenized</p> <p>19 society. So, sex between an adult man and a young boy</p> <p>20 has been marginalized, meaning that it's put on the</p> <p>21 margin, it's taken out of the mainstream --</p> <p>22 A. Right.</p> <p>23 Q. -- and it's been isolated as the providence of</p> <p>24 pervert -- quote, perverts and child molesters.</p> <p>25 What do you mean? Why did you put</p>	<p style="text-align: right;">Page 93</p> <p>1 Q. It's --</p> <p>2 A. You're calling --</p> <p>3 Q. -- epistemological.</p> <p>4 A. Excuse me?</p> <p>5 Q. Nothing.</p> <p>6 So, you criticize the squeamishness and</p> <p>7 timidity of gay intellectuals that made them tacit</p> <p>8 collaborators in this marginalization pederasty?</p> <p>9 A. Yes, I think that has been proved, starting in</p> <p>10 the 1980s, at the time of the child abuse panic --</p> <p>11 Q. And --</p> <p>12 A. -- that we discussed.</p> <p>13 Q. -- and gays today have sold out the real</p> <p>14 pederasts by pretending that there can be a nonsexual</p> <p>15 pederasty between adult man and young boy, true?</p> <p>16 A. I'm talking about Plato --</p> <p>17 Q. Yeah.</p> <p>18 A. -- at this time.</p> <p>19 Q. No, you're talking about squeamishness and</p> <p>20 timidity of gay intellectuals in the face of public</p> <p>21 hostility. That's right now, aren't you?</p> <p>22 A. And also in Plato's time.</p> <p>23 Q. Okay. Sure. Made them tacit collaborators.</p> <p>24 Even as Plato's and others sold out the real pederasts,</p> <p>25 gay leaders today sell out their brothers by creating</p>

May 25, 2021

94 to 97

<p style="text-align: right;">Page 94</p> <p>1 the public fiction that most guys are involved in</p> <p>2 long-term monogamous and age and class relationships.</p> <p>3 A. Yes.</p> <p>4 Q. That's not true, is it? Most gays are not</p> <p>5 involved in long-term monogamous age and classical</p> <p>6 relationships?</p> <p>7 A. Yes, that is what the evidence shows is that --</p> <p>8 that is untrue, but I think a lot of those mainstream</p> <p>9 gay rights organizations who focus on gay marriage, and</p> <p>10 gay adoption, and -- and, you know, professional</p> <p>11 advancement of -- of, you know, gays in -- in</p> <p>12 professions, you know, are -- are really not looking at</p> <p>13 the issues of how the criminal justice system, you know,</p> <p>14 treats less fortunate gay men.</p> <p>15 Q. And you also attack the fiction that the only</p> <p>16 men attracted to teenage boys are a few sickos in</p> <p>17 NAMBLA.</p> <p>18 A. Yes.</p> <p>19 Q. Are you -- are you telling me that most gay men</p> <p>20 are attracted to teenage boys?</p> <p>21 A. No, just that -- that those who are, are not</p> <p>22 necessarily sick or involved with organizations like</p> <p>23 NAMBLA. I mean, again, this is a statement that -- that</p> <p>24 would not necessarily be welcomed to NAMBLA.</p> <p>25 Q. I didn't ask about that though. I'm just</p>	<p style="text-align: right;">Page 96</p> <p>1 Raphael without going out and trying to seduce underage</p> <p>2 people.</p> <p>3 Q. We're done with that one.</p> <p>4 A. Okay. You want to ask about another article?</p> <p>5 Q. I don't.</p> <p>6 A. Okay.</p> <p>7 Q. Let's see here. This is gonna be number . . .</p> <p>8 THE REPORTER: Seven. Seven.</p> <p>9 Q. (BY MR. PRINGLE, JR.) Seven.</p> <p>10 (Exhibit 7 marked)</p> <p>11 Q. (BY MR. PRINGLE, JR.) This is: Sexual Consent</p> <p>12 and the Adolescent Male, or What We Can Learn from the</p> <p>13 Greeks.</p> <p>14 A. Yes.</p> <p>15 Q. And you wrote this when, 2010?</p> <p>16 A. Well, I would've written it a year or two</p> <p>17 earlier, but it was published in 2010. I mean, there's</p> <p>18 a lag time in publication -- in scholarly publication.</p> <p>19 Q. All right. So, you talk about -- on page --</p> <p>20 well, the first page doesn't have any page numbers on</p> <p>21 the bottom, but I'm talking about the page on the right,</p> <p>22 on the first page.</p> <p>23 A. In other words, the second page of the article?</p> <p>24 Q. In other words, the second page of the article.</p> <p>25 A. Okay.</p>
<p style="text-align: right;">Page 95</p> <p>1 asking you -- are -- are you saying that in addition to</p> <p>2 the few sickos in NAMBLA --</p> <p>3 A. Uh-huh.</p> <p>4 Q. -- obviously, lots of people in NAMBLA would be</p> <p>5 attracted to teenage boys, true?</p> <p>6 A. And some of them would be genuine pedophiles.</p> <p>7 Q. Right. But what you're saying, that there's a</p> <p>8 lot more gay people that are attracted to teenage boys</p> <p>9 besides those sickos in NAMBLA?</p> <p>10 A. Sure. I think most average gay men can find an</p> <p>11 attraction to teenage boys, but most of them don't act</p> <p>12 on it, just as most heterosexual men find teenage girls</p> <p>13 attractive, but they have enough self control and self</p> <p>14 discipline that they don't violate the law.</p> <p>15 Q. Do you have any concern that what you just said</p> <p>16 perpetuates this myth that sex between adult men and</p> <p>17 underage boys is a province of most gay men?</p> <p>18 A. No more so nor less so than a heterosexual men</p> <p>19 in regard to teenage girls.</p> <p>20 Q. So, to that extent then, you would agree with</p> <p>21 that, correct?</p> <p>22 A. An appreciation of beauty does not necessarily</p> <p>23 equate with seeking a sexual relationship with someone.</p> <p>24 Most of us have self control. I can appreciate the</p> <p>25 beauty of a painting by Karachi, or Michael Angelo, or</p>	<p style="text-align: right;">Page 97</p> <p>1 Q. "As I have documented elsewhere (Hubbard,</p> <p>2 1998)" -- and what is that publication?</p> <p>3 A. That was the one in Orion that was titled,</p> <p>4 "Popular Perceptions of Elite Pederasty --"</p> <p>5 Q. Gotcha.</p> <p>6 A. "-- in Classical Athens."</p> <p>7 Q. Now you say that Athenian pederasty was</p> <p>8 primarily an upper-class insti -- institution between</p> <p>9 youths of good family and education between the ages of</p> <p>10 puberty and full beard-growth, between about 14 and 21,</p> <p>11 correct?</p> <p>12 A. Yes.</p> <p>13 Q. And you argued that the lover -- the -- the</p> <p>14 older partner --</p> <p>15 A. Yes.</p> <p>16 Q. -- could act as a surrogate father figure for</p> <p>17 an adolescent boy.</p> <p>18 A. Yes, because Greeks did not marry -- Greek men</p> <p>19 did not marry until they were in their 30s, then, of</p> <p>20 course, the average mortality was at a much younger age,</p> <p>21 particularly in times of war or plaque, like late Fifth</p> <p>22 Century Athens.</p> <p>23 Q. On -- on pay -- on the next page, page 128, you</p> <p>24 say: In some cases, pederastic love might become an</p> <p>25 instrument of social mobility?</p>

<p style="text-align: right;">Page 98</p> <p>1 A. Yes.</p> <p>2 Q. Meaning that a young boy -- talented and</p> <p>3 attractive young boy of a -- of a certain age could</p> <p>4 progress socially because of the pederastic liaison with</p> <p>5 an older man?</p> <p>6 A. Yes, he -- he would be invited to symposia and</p> <p>7 parties where he would meet other members of the social</p> <p>8 elite.</p> <p>9 Q. Does that still happen today, you know?</p> <p>10 A. I don't really think so. I mean -- but, you</p> <p>11 know, we -- we do have episodes, like that 16-year-old</p> <p>12 boy who went to a party of gay men, including Kevin</p> <p>13 Spacey, and said he was then raped by Kevin Spacey. I</p> <p>14 mean, what I wonder about is why was the boy at that</p> <p>15 party to begin with? But I -- I think that's relatively</p> <p>16 uncommon now.</p> <p>17 Q. You talk about one of Aristotle's pupils?</p> <p>18 A. Yes. The problems are -- are generally assumed</p> <p>19 not to be by Aristotle himself, but by later members of</p> <p>20 the Peripatetic school.</p> <p>21 Q. And what do Aristotle's pupils tell us?</p> <p>22 A. Well -- okay. Clearly tells us that the reason</p> <p>23 some grown men like to be anally penetrated is that it</p> <p>24 erects pleasant memories of having enjoyed it so much as</p> <p>25 a pubescent boy. Yes, I -- I give that passage in the</p>	<p style="text-align: right;">Page 100</p> <p>1 when filling out surveys much later --</p> <p>2 Q. About --</p> <p>3 A. -- sounds --</p> <p>4 Q. -- their prison?</p> <p>5 A. Not just from those. A lot of the surveys were</p> <p>6 surveys of students in psychology classes. I mean,</p> <p>7 that -- that's where psychologists get a lot of the</p> <p>8 data, and what -- what those surveys intended to show is</p> <p>9 that the form of sex doesn't really matter.</p> <p>10 There are only two things that are really</p> <p>11 statistically significant, in terms of determining</p> <p>12 whether someone has a pleasant memory or an unpleasant</p> <p>13 memory. The first thing is whether it was coercive or</p> <p>14 noncoercive, and the second thing is whether we're</p> <p>15 talking about a girl or a boy. Boys are far more likely</p> <p>16 to react well to adolescent sexual experiences than</p> <p>17 girls are, which is one of the reasons I propose --</p> <p>18 or -- or, at least, throw out the idea that we might</p> <p>19 consider a different age of consent for the two sexes.</p> <p>20 Q. We'll get to that.</p> <p>21 My question to you, though, was -- you</p> <p>22 said: This wouldn't be true today, that the reason some</p> <p>23 grown men like to be annually penetrated is that it</p> <p>24 wakes pleasant memories of having enjoyed it so much as</p> <p>25 a pubescent boy. Why is that not true today?</p>
<p style="text-align: right;">Page 99</p> <p>1 book that I sent you.</p> <p>2 Q. And so part of your scholarship is, is to</p> <p>3 explain, back in Greece, that one of the reason that</p> <p>4 some grown men like to be anally penetrated is that it</p> <p>5 awake -- awoke pleasant memories of being anally</p> <p>6 penetrated --</p> <p>7 A. That -- that's --</p> <p>8 Q. -- as a pubescent boy?</p> <p>9 A. -- that's what that text says. It's not what I</p> <p>10 say. And to be sure, the -- the Peripatetic</p> <p>11 understanding of biology is not accurate in my modern</p> <p>12 medical opinion. So, no, I don't agree with it, but</p> <p>13 it's what the text said.</p> <p>14 Q. You don't have a position on that?</p> <p>15 A. About whether that's true today?</p> <p>16 Q. Yeah, a reason that some grown men like to be</p> <p>17 anally penetrated is -- is that it awakes pleasant</p> <p>18 memories of having enjoyed it so much as a pubescent</p> <p>19 boy.</p> <p>20 A. I think it would be rather unusual today.</p> <p>21 Q. Why?</p> <p>22 A. It's only a minority of -- of relationships</p> <p>23 of -- of age differential relationships where anal sex</p> <p>24 is even at issue. And what the psychological evidence</p> <p>25 shows is that whether boys retrospectively -- I mean,</p>	<p style="text-align: right;">Page 101</p> <p>1 A. Well, it might be true of some of them. I</p> <p>2 mean, those who are specifically gay oriented often look</p> <p>3 back on their adolescent sexual experiences as very</p> <p>4 formative in coming out with their identity.</p> <p>5 And, I mean, there was one study that was</p> <p>6 published in the "Archives of Sexual Behavior," I think,</p> <p>7 around 2001, that -- that specifically looked at the</p> <p>8 reactions of gay boys. There's the -- there are the</p> <p>9 books of Rich Savin-Williams at Cornell who -- who deals</p> <p>10 with gay adolescents. And, I think, what this showed</p> <p>11 was that about 77 percent of them, of those who had had</p> <p>12 adolescent experiences with men above the age of</p> <p>13 consent, evaluated it as a positive experience as</p> <p>14 opposed to only about 12 percent who said it was</p> <p>15 negative and -- and then a certain amount who said it</p> <p>16 was equally balanced, that there were good aspects, bad</p> <p>17 aspects.</p> <p>18 Q. Do you think that some grown men may've -- may</p> <p>19 have unpleasant memories of having been anally</p> <p>20 penetrated as a pubescent boy by an adult male?</p> <p>21 A. Certainly.</p> <p>22 Q. And you think that heterosexual boys would</p> <p>23 enjoy that?</p> <p>24 A. No, hetero -- boys who are not gay or bisexual</p> <p>25 are more likely to find it a negative experience, but</p>

May 25, 2021

102 to 105

<p style="text-align: right;">Page 102</p> <p>1 not even all of them did.</p> <p>2 Q. Okay. You mentioned the study -- that the</p> <p>3 77 percent?</p> <p>4 A. Uh-huh.</p> <p>5 Q. So, 77 percent of boys who identify as gay or</p> <p>6 bisexual --</p> <p>7 A. Uh-huh.</p> <p>8 Q. -- who had sexual experiences before the age of</p> <p>9 consent rated to be a positive experience?</p> <p>10 A. We're talking about specifically sexual</p> <p>11 relations with someone above the age of consent when</p> <p>12 they were below the age of consent --</p> <p>13 Q. Right.</p> <p>14 A. -- and -- and, you know, that this was based on</p> <p>15 Rich Savin-Williams.</p> <p>16 Q. But the sample is completely silent as to</p> <p>17 heterosexual boys, not gay or bisexual boys, but</p> <p>18 heterosexual boys who had a sexual relations --</p> <p>19 relationship with an adult male over the age of consent.</p> <p>20 A. That -- that is not the population that</p> <p>21 Savin-Williams was doing research on.</p> <p>22 Q. Or that you had done research on?</p> <p>23 A. Well, except to the extent that our prison</p> <p>24 survey of, you know, a thousand-odd people, you know,</p> <p>25 had large numbers of heterosexual respondents, some of</p>	<p style="text-align: right;">Page 104</p> <p>1 Lysias' treatise instead" -- but read that if you would.</p> <p>2 A. "Lysias' treatise instead advises sexual</p> <p>3 intimacy with someone who is not so passionate, but</p> <p>4 takes for granted that sex with boys is a good thing."</p> <p>5 Q. And then you cite your own writing?</p> <p>6 A. The first citation is to my sourcebook, and</p> <p>7 that is simply giving the text of Plato's "Phaedrus,"</p> <p>8 and -- and the particular passage in the "Phaedrus"</p> <p>9 where Lysias says that.</p> <p>10 Q. Do you think somebody could read this passage</p> <p>11 and come away with the impression that sex with the boys</p> <p>12 is a good thing?</p> <p>13 A. In my opinion? No, I'm -- I'm citing Lysias</p> <p>14 here. I'm making it very clear I'm talking about an</p> <p>15 Ancient author.</p> <p>16 Q. What's canard?</p> <p>17 A. A -- a general opinion that's false.</p> <p>18 Q. All right. So, you think it's a false opinion</p> <p>19 that all adults always have more power in a relationship</p> <p>20 with someone younger?</p> <p>21 A. Yes, I do.</p> <p>22 Q. You think sometime the boy has all the power?</p> <p>23 A. Well, certainly in -- in present day society</p> <p>24 they do, because the boy can put the adult in prison by,</p> <p>25 you know, talking about it to his parents or the police</p>
<p style="text-align: right;">Page 103</p> <p>1 whom had sexual experiences with adult men, some of whom</p> <p>2 had sexual experiences with adult women, some of whom</p> <p>3 had no experiences underage, some of whom had abusive</p> <p>4 experiences or experiences that they considered abusive,</p> <p>5 some of whom had experiences that they considered</p> <p>6 consensual. I mean, we're -- we're looking at all those</p> <p>7 correlations.</p> <p>8 Q. But in terms of specifically studying that</p> <p>9 population of heterosexual boys who have been anally</p> <p>10 penetrated by an adult male when they're underage, any</p> <p>11 studies on that, that you're aware of?</p> <p>12 A. Not that focuses only on that, but that is part</p> <p>13 of what we are analyzing, is what is the difference</p> <p>14 between those who are gay or bisexual in their</p> <p>15 identification and those who are heterosexual. And --</p> <p>16 and what we have found, and this is confirmed by other</p> <p>17 studies, is that those who are heterosexual in their</p> <p>18 orientation tend to be more negative about early</p> <p>19 homosexual experiences that they had, although even they</p> <p>20 are not uniformly so.</p> <p>21 Q. Let's go to page 130.</p> <p>22 A. Uh-huh.</p> <p>23 Q. On -- there's this full paragraph there that</p> <p>24 says -- and I'm -- I'm gonna read the sentence. See</p> <p>25 that sentence? It begins: "Ly -- Lysias -- Lysias's --</p>	<p style="text-align: right;">Page 105</p> <p>1 or whatever. So, yes, in -- in current society, they</p> <p>2 do.</p> <p>3 Q. Well, you wouldn't think that a boy would use</p> <p>4 that power to entice someone into having sex with them,</p> <p>5 would you?</p> <p>6 A. Well, there have been cases of blackmail that</p> <p>7 have been -- have occurred.</p> <p>8 Q. Do you think the boy goes and says: Hey, I can</p> <p>9 put you in prison if you have sex with me. I got that</p> <p>10 power over you, let's have some sex. Is that what</p> <p>11 you're saying?</p> <p>12 A. I once heard a man who had gotten involved with</p> <p>13 Big Brother's, tell me that the youngster that he was</p> <p>14 paired with had said something to that effect to him,</p> <p>15 and after that he just wanted nothing more to do with</p> <p>16 him or with the Big Brother's program.</p> <p>17 THE REPORTER: Or with the what, I'm</p> <p>18 sorry? Or with the --</p> <p>19 MR. PRINGLE, JR.: The Big Brother's</p> <p>20 program.</p> <p>21 Q. (BY MR. PRINGLE, JR.) That's not the canard</p> <p>22 you're talking about though, is it?</p> <p>23 A. No.</p> <p>24 Q. You're saying that it -- that boys often have</p> <p>25 more power in a sexual relationship with an adult male</p>

May 25, 2021

106 to 109

<p style="text-align: right;">Page 106</p> <p>1 because the boy is youthful and beautiful --</p> <p>2 A. Yes.</p> <p>3 Q. -- and that -- and that's what the adult sees?</p> <p>4 A. Yes, it's --</p> <p>5 Q. And --</p> <p>6 A. -- what many adults see.</p> <p>7 Q. And the boy can hold that youth and pow --</p> <p>8 youth and beauty as power to manipulate the older -- the</p> <p>9 older adult, correct?</p> <p>10 A. There are many Greek texts that confirm that.</p> <p>11 And, again, this sentence is talking about the Greeks.</p> <p>12 Q. But you also say that's present in the -- in</p> <p>13 the current world, isn't it, that boys have that</p> <p>14 manipulative power over older men? You don't say it</p> <p>15 here, but you say it, don't you?</p> <p>16 MR. SIBLEY: Objection.</p> <p>17 A. You -- you'd have to show me the exact place</p> <p>18 where I say --</p> <p>19 Q. (BY MR. PRINGLE, JR.) Well --</p> <p>20 A. -- this.</p> <p>21 Q. -- I'm asking you, do you believe that to be</p> <p>22 the case?</p> <p>23 A. That boys today sometimes have more power in</p> <p>24 the relation -- well, I just told you that -- that under</p> <p>25 current law, they do.</p>	<p style="text-align: right;">Page 108</p> <p>1 the world, but the young had the power of beauty which</p> <p>2 to the estheticizing elite of an esthetically</p> <p>3 sophisticated civilization, there was no insubstantial</p> <p>4 advantage.</p> <p>5 That's still true today, isn't it?</p> <p>6 A. No, my sentence is in the past tense.</p> <p>7 Q. Okay. So, today, you don't think that the --</p> <p>8 because of the power of beauty of youth, they don't have</p> <p>9 an advantage over adult males in a sexual relations --</p> <p>10 relationship?</p> <p>11 A. They may in some cases, but I would also say</p> <p>12 that most people in our society are not part of the</p> <p>13 estheticizing elite. And I would also say our</p> <p>14 civilization now is not esthetically sophisticated;</p> <p>15 quite the contrary.</p> <p>16 Q. Let's go to page 132.</p> <p>17 A. Yes.</p> <p>18 Q. Under "A THOUGHT EXPERIMENT."</p> <p>19 A. Yes.</p> <p>20 Q. We have -- it -- it said -- you -- you -- well,</p> <p>21 go ahead and tell us what the question is that you pose.</p> <p>22 A. "To what extent can the evidence of the Greek</p> <p>23 model be applicable to modern Western societies?"</p> <p>24 Q. And let me stop you there. You're asking, to</p> <p>25 what evidence -- to what extent can the evidence of the</p>
<p style="text-align: right;">Page 107</p> <p>1 Q. Separate and apart -- I'm talking about the</p> <p>2 power to entice sexual relations. Do you believe that</p> <p>3 sometimes boys entice older men into sexual</p> <p>4 relationships by their youth and beauty?</p> <p>5 A. Yes.</p> <p>6 Q. Okay.</p> <p>7 A. There are many boys who initiate the</p> <p>8 relationships.</p> <p>9 Q. Okay.</p> <p>10 A. As in the example -- and this is quite</p> <p>11 frequent -- of boys who can go on these adult hook-up</p> <p>12 sites and pretend to be 18 when they're younger.</p> <p>13 Q. And because of -- of their youth and beauty,</p> <p>14 oftentimes it's the boys who have the power in the</p> <p>15 relationship and the adult is powerless, true?</p> <p>16 MR. SIBLEY: Objection.</p> <p>17 A. Well, the boys have -- have the power to</p> <p>18 withdraw from the relationship. They have the power to</p> <p>19 go to their parents or the police and misrepresent the</p> <p>20 relationship. I mean, if they find that the</p> <p>21 relationship starts to become something they no longer</p> <p>22 enjoy or feel that the man is abusive, they can cause</p> <p>23 him an awful lot of problem.</p> <p>24 Q. (BY MR. PRINGLE, JR.) You say: Older men might</p> <p>25 have more money, social connections, or experience of</p>	<p style="text-align: right;">Page 109</p> <p>1 Greek model of pederastic sexual relations between adult</p> <p>2 males and young boys, correct?</p> <p>3 A. Teenage boys.</p> <p>4 Q. Teenage boys.</p> <p>5 And you want to know, to -- to what</p> <p>6 evidence can that model be applicable to today. Go</p> <p>7 ahead.</p> <p>8 A. Yes, and -- and what I go on to say in --</p> <p>9 Q. Go ahead and read it.</p> <p>10 A. Oh, you want me to read the whole paragraph?</p> <p>11 Q. Yeah. Go ahead and . . .</p> <p>12 A. "We have in Greece the documented record of a</p> <p>13 culturally advanced and highly successful society: It</p> <p>14 suggest that where age-discrepant relationships are</p> <p>15 commonplace and positively reinforced, they cause little</p> <p>16 or no long-term harm to the younger partner and often</p> <p>17 confer great benefit in elite enculturation."</p> <p>18 Q. So, in answer to your question of to what</p> <p>19 extent can the Greek model of sex between boys and men</p> <p>20 be applicable, you say: Well, we have in Greece this</p> <p>21 evidence of this barely advanced and successful society</p> <p>22 suggesting my muse -- or relationships are commonplace</p> <p>23 and reinforced, the boy's not hurt, and it converts --</p> <p>24 and -- and confers great benefits to society. Is that</p> <p>25 what you're saying?</p>

May 25, 2021

110 to 113

<p style="text-align: right;">Page 110</p> <p>1 A. No. No. It confers great benefits in elite 2 enculturation. In other -- 3 Q. In benefit to society, though, isn't it? 4 A. It -- it's a benefit to boys who are part of 5 the elite or ambitious to become part of the elite, and 6 that's not always. And, you know, in democratic 7 society, the elites are no longer as dominant as they 8 were in pre-democratic society. 9 Q. So, the answer to your question is, to what 10 extent can evidence of Greek pederasty be applicable to 11 today's world? Well -- 12 A. Well -- 13 Q. -- here's -- here's what we know. That back in 14 Greece, when these pederastic relationships were 15 commonplace and positively reinforced, didn't hurt the 16 boys a bit and conferred greater benefit to them, right? 17 That's how it could've -- that's how it could be 18 applicable to modern societies. 19 A. What I am saying there is from the Greek 20 evidence -- which I have studied thoroughly. I, you 21 know, published a 600-page sourcebook collecting all the 22 relevant text. Aside from the myth of Chrysippus, which 23 we discussed -- and that was a myth formulated by the 24 Cryogenian Euripides -- we now have evidence that -- 25 that -- you know, boys felt harmed by this. The fact</p>	<p style="text-align: right;">Page 112</p> <p>1 then. Why isn't that applicable today? 2 A. As I previously stated in response to your 3 previous question: We are not a society that encourages 4 elite enculturation. We are a democratic society. And 5 as I argued in this other article we talked about, 6 pederasty is fundamentally incompatible with democracy. 7 Q. So, why is that the answer to -- to what extent 8 can the evidence of the Greek model be applicable to 9 modern western societies? Why do you answer it that 10 way? That's the question you pose, and you answer it: 11 It was great back then. This should be applicable to 12 modern society. 13 A. If modern society were to return to being an 14 aristocratic society in which you learned elite behavior 15 from other elite men, it might present advantages. And 16 then as I go on to say in the next sentence: Such 17 relationships provided the young men, the erastés, the 18 lovers with an alternative to early marriage and -- 19 Q. You say that in addition? 20 A. Yes, so that's another answer to the question. 21 And a third answer to the question is what I say later 22 in this section, is what it proves about the capacity of 23 teenage boys to assert consent or nonconsent. And all 24 of our Greek evidence, whether either graphic or 25 literary very much shows they did because there is much</p>
<p style="text-align: right;">Page 111</p> <p>1 that it was mainly elite boys who were the ideal love 2 object and who would become future members of the elite, 3 also, you know, tells us, in a context where people 4 approve of such relationships, they are not necessarily 5 harmful. 6 Now -- now we are not an elite oriented 7 society today. And the other thing that I go on to 8 explain in this section is that the real relevance is 9 that it shows that teenage boys were considered by the 10 Greeks to have the power of volition. In other words, 11 the power to give or withhold consent in Greek society. 12 So, any arguments that are based on a, kind of, 13 universalizing assertion that no one below the age of 18 14 or 17 is capable of understanding enough about sex to 15 give consent are -- are really inconsistent with the 16 historical and anthropological and even psychological 17 evidence. 18 Q. But you're touting of the benefits of these 19 pederastic sexual relationship between man and boy, that 20 when it's commonplace and reinforced, it causes little 21 to no long-term harm to the younger partner and confers 22 great benefits, and -- and that's the answer to the 23 question of: How can this be applicable to the modern 24 world? And your response is: Well, look at all -- look 25 at all it did for Ancient Greece. It was great back</p>	<p style="text-align: right;">Page 113</p> <p>1 evidence of boys turning men down, emphatically turning 2 them down, or choosing to abandon a partner for someone 3 else. 4 Q. Could so -- could someone reading your article 5 come away with the conclusion that it's your opinion 6 that where age-discrepant relationships are commonplace 7 and positively reinforced, sex between man and boy, they 8 cause little or no long-term harm to the partner and he 9 actually benefits from it? 10 MR. SIBLEY: Objection. 11 A. That was the situation in Ancient Greece based 12 on the evidence we have. 13 Q. (BY MR. PRINGLE, JR.) And is it your opinion 14 that's the case today? 15 A. No, because they are not positively reinforced 16 in our society. 17 Q. But if I they were -- 18 A. They -- 19 Q. -- positive -- 20 A. -- they -- they are -- are -- are very much 21 stigmatized. 22 Q. So, then, how is that applicable to modern 23 western societies, what you -- what you cite there? 24 A. It shows that such relationships are not 25 inherently harmful as a law of nature, because we have</p>

May 25, 2021

114 to 117

<p style="text-align: right;">Page 114</p> <p>1 all these societies where it is. And it's not just</p> <p>2 Ancient Greece. This is well attested in the</p> <p>3 anthropological record and in the historical record of</p> <p>4 virtually all of western civilization and eastern</p> <p>5 civilization too. I mean, the Chinese don't even have</p> <p>6 the concept of an age of consent.</p> <p>7 Q. So, there's nothing inherently harmful</p> <p>8 between -- in -- in sex between an adult male and a</p> <p>9 14-year-old boy, in your mind?</p> <p>10 A. Given that there are so many 14 year olds --</p> <p>11 even in our society today where it is not positively</p> <p>12 enforced who -- who say that they found it a positive</p> <p>13 experience; that even with the extreme stigmatization of</p> <p>14 those relationships today, there are still a lot</p> <p>15 nevertheless say it was positive.</p> <p>16 Now, if -- if our society were like</p> <p>17 Ancient Greece, in terms of celebrating such</p> <p>18 relationships as -- as something that is fashionable and</p> <p>19 elite, the situation would be very different. But, of</p> <p>20 course, that's not true in our society. It's not likely</p> <p>21 to become true in our society. Again, as I've argued in</p> <p>22 the other article, it's fundamentally incompatible with</p> <p>23 democracy, and I -- I do -- whatever else happens, I</p> <p>24 don't see us returning to an aristocratic system.</p> <p>25 Q. Well, you go on to pose the question, at the</p>	<p style="text-align: right;">Page 116</p> <p>1 harmful and exploitive, but it often is; but not always.</p> <p>2 Again, I mean you've got this percentage of -- of people</p> <p>3 who say that those relationships -- reflecting back in</p> <p>4 their adult years on the relationships they had as</p> <p>5 adolescents with someone who may've been a few years</p> <p>6 older, we -- we have people saying that, on balance, it</p> <p>7 was more positive than negative.</p> <p>8 Q. Or at least I remember the quote. At least I'm</p> <p>9 telling you I remember it that way. That's what we're</p> <p>10 hearing, right?</p> <p>11 A. I -- I think as I have said previously, most</p> <p>12 people remember their first sexual experience very</p> <p>13 powerful and remember whether it was something they were</p> <p>14 into or -- or something that, you know, they found to be</p> <p>15 traumatic.</p> <p>16 Q. Or something they found to be shameful and</p> <p>17 never to be repeated again?</p> <p>18 A. Yes, that, too --</p> <p>19 Q. Yeah.</p> <p>20 A. -- because it's marginalized in our society. I</p> <p>21 mean, we -- we have no-nothing social workers who</p> <p>22 haven't studied the real scholarship but just</p> <p>23 communicate whatever they learned in their MSW program</p> <p>24 of -- who convinced people who tell them that they had</p> <p>25 sexual relationships that: Oh, you were really</p>
<p style="text-align: right;">Page 115</p> <p>1 top of page 134, to the similar flexibility in regard to</p> <p>2 sexuality and symol -- citizenship fit the modern world.</p> <p>3 A. I pose a question.</p> <p>4 Q. And how do you answer it?</p> <p>5 A. Under certain conditions, it might be able to.</p> <p>6 Q. Under certain conditions, sex between an adult</p> <p>7 male and a 14-year-old boy might fit in modern world?</p> <p>8 A. It -- it fits the modern world in Germany, and</p> <p>9 Italy, and -- and Taiwan, and South Korea, and all these</p> <p>10 other countries. And the evidence is that mental --</p> <p>11 that adolescent mental health suicide rate -- adolescent</p> <p>12 suicide rates are -- are lower in those countries. The</p> <p>13 mental health of adolescents is generally better in</p> <p>14 countries that have a more tolerant attitude to</p> <p>15 sexuality and give young people better sex education</p> <p>16 than we do here in the U.S.</p> <p>17 Q. You question whether pederastic mentorship is</p> <p>18 harmful and exploitive in our society. That's</p> <p>19 something that -- that's a question that you asked,</p> <p>20 correct?</p> <p>21 A. Yes, it's a question. That's what we do as</p> <p>22 scholars is we ask questions. We don't always have the</p> <p>23 answers.</p> <p>24 Q. You got an answer to that one though?</p> <p>25 A. I -- I believe that it is not necessarily</p>	<p style="text-align: right;">Page 117</p> <p>1 exploited. You -- you may have thought that you liked</p> <p>2 that man and that he was really helping you, but he was</p> <p>3 exploiting you. He was using you.</p> <p>4 And all your life problems can be traced</p> <p>5 back to that. That is what a lot of rather stupid</p> <p>6 social workers tell their clients, and --</p> <p>7 Q. Well --</p> <p>8 A. -- it's very harmful.</p> <p>9 Q. What you say is: There's much wisdom that can</p> <p>10 only be learned through one-on-one interaction with an</p> <p>11 older and more experienced practitioner of an art or</p> <p>12 skill.</p> <p>13 A. Yes.</p> <p>14 Q. By that, are you meaning that a young man of</p> <p>15 14, 15 year old can learn quite a bit from sex with an</p> <p>16 older man?</p> <p>17 A. He can learn quite a bit about sex. I mean, an</p> <p>18 older part -- a partner who's a few years older is much</p> <p>19 more likely to practice safe sex than if the boy is</p> <p>20 having sex with someone his own age. He's much more</p> <p>21 likely, you know --</p> <p>22 Q. He -- he probably perfected his technique?</p> <p>23 A. Yes. And, yeah, I mean he -- he's much more</p> <p>24 likely to know how to have anal sex without it hurting</p> <p>25 than another 16 or 15 year old would. He -- and he's --</p>

<p style="text-align: right;">Page 118</p> <p>1 he's -- you know, he -- he's more mature in other 2 respects. I mean, he's less likely to use force. I 3 mean, you know about the peak ages are for likelihood to 4 commit rape? They're 17 and 18. 5 Q. So, these things about the techniques of anal 6 sex and how to perform sexually, that's something that a 7 14-year-old boy can, and probably should, learn from an 8 older practitioner? 9 MR. SIBLEY: Objection. 10 A. I'm not saying "should." 11 Q. (BY MR. PRINGLE, JR.) But they certainly can. 12 A. I'm saying "can," but I'm not saying "should." 13 Q. And you want to give that 14-year-old boy the 14 opportunity to do that? 15 A. If he wants to and if it is legal in his 16 jurisdiction. 17 Q. And do you think it should be legal in -- in 18 all jurisdictions? 19 A. I would be comfortable with an age of consent 20 of either 14 or 15 for adolescent boys -- 21 Q. Okay. 22 A. -- but not for adolescent girls. 23 Q. What -- what about for teens who are neither 24 boys nor girls? 25 A. I mean, for -- for those who are gender queer</p>	<p style="text-align: right;">Page 120</p> <p>1 talking about someone who is genuinely gender neutral 2 and has been rendered such by puberty blockers, I think 3 it would be problematic. 4 Q. How do you articulate this different age of 5 consent, one for boys and one for girls, when that 6 doesn't cover everybody? 7 MR. SIBLEY: Objection, form. Objection. 8 A. Well, separate provision would have to be made 9 for the other varieties of gender identity -- 10 Q. (BY MR. PRINGLE, JR.) How would -- 11 A. -- and I don't -- I personally don't know the 12 answer to that question. I don't know everything, 13 believe it or not. I mean, I ask questions; that's what 14 scholars do. I don't have all the answers; none of us 15 do. 16 Q. You go on to say -- where you talk about how 17 these kinds of things, like anal penetration, can be 18 learned through one-on-one interaction with an older, 19 more experienced practitioner, or skill. You go on to 20 say that particularly for those not born to privileged 21 family backgrounds or who -- boys who grow up without 22 fathers, social graces or eloquence and more awareness 23 can most readily come from close personal intimacy with 24 older, respected, extra -- extrafamilial role models 25 en -- embody in these capacities.</p>
<p style="text-align: right;">Page 119</p> <p>1 and -- 2 Q. What's -- 3 A. -- or for -- 4 Q. -- your age of consent for them? 5 A. -- transsexual, the evidence shows that they 6 are less likely to want to be sexual with anyone -- 7 Q. And my -- 8 A. -- for that age. 9 Q. -- question's different though. What is -- 10 what is your position on the appropriate age of consent 11 for individuals who don't declare as a boy or a girl? 12 MR. SIBLEY: Objection. 13 A. It -- it depends on the individual 14 circumstances. If they have been given puberty 15 blockers, which is an increasingly common prescription 16 for prepubescent kids who question their gender 17 identity, then they have not yet come to puberty. And 18 if you remember my saying, that -- that I only advocate 19 sexual freedom for boys who have reached the age of 20 puberty. 21 Now, if a female-to-male individual is 22 receiving heavy doses of testosterone and hormonal 23 treatment, then their sexual desires may be intensified, 24 in -- in which case, you know, we -- we should consider 25 giving them the same choices as boys. But if you're</p>	<p style="text-align: right;">Page 121</p> <p>1 Are you saying that boys can acquire the 2 social graces and more eloquence and more awareness from 3 an adult with whom they have a sexual relationship? 4 A. Yes. Many boys are -- I mean grow up in 5 dysfunctional families, particularly gay boys whose 6 families may not approve of that identity or may kick 7 them out of their house. 8 I -- I feel I've learned a great deal from 9 my first relationship, which, you know, wasn't an adult 10 age but with a man 16 years older than me who, you know, 11 was of much higher social class than my family was. 12 Q. All right. But you're saying that this 13 phenomenon of pederasty, of sex between boys and men, 14 can also provide such boys with a father figure? 15 A. Yes. I mean, quite often -- like, I would say 16 more often than not, boys who are gay or bisexual tend 17 to have a missing father. 18 Q. And so your solution, then, is a sex partner? 19 A. I think -- 20 Q. It's one solution? 21 A. -- I -- it is one possible solution. It's not 22 the only one. 23 Q. Okay. And I'm onto the next page, on the right 24 side of the page there. No, don't -- you don't even 25 need to flip it. It's 135.</p>

May 25, 2021

122 to 125

<p style="text-align: right;">Page 122</p> <p>1 A. Uh-huh.</p> <p>2 Q. You talk about "liberal sex education curricula</p> <p>3 in the U.S." Do you see that sentence that about six</p> <p>4 or --</p> <p>5 A. Is this --</p> <p>6 Q. -- seven lines?</p> <p>7 A. -- in the first paragraph?</p> <p>8 Q. Yeah, it's about six or seven lines down.</p> <p>9 A. Oh, okay. Yes, I see.</p> <p>10 Q. "liberal sex education curricula in the U.S.</p> <p>11 centers upon sexuality as something for risk and danger</p> <p>12 for the young, whether in the form of unplanned</p> <p>13 pregnancy or sexual transmitted diseases."</p> <p>14 You seem critical of that. Are you</p> <p>15 critical of that?</p> <p>16 A. It was certainly the nature of the sex</p> <p>17 education that I received at a fairly progressive high</p> <p>18 school in, you know, well-to-do San Francisco suburb.</p> <p>19 It was almost all about diseases and pregnancy. There</p> <p>20 was nothing about relationship education. Scant mention</p> <p>21 of love and what it means to love and care for another</p> <p>22 person. It would typically be either the biology</p> <p>23 teacher or one of the coaches who would teach those</p> <p>24 classes. And -- and -- and, you know, California, in</p> <p>25 the 1970s, was a -- a pretty progressive state compared</p>	<p style="text-align: right;">Page 124</p> <p>1 Q. -- correct?</p> <p>2 A. Yes, I do.</p> <p>3 Q. Because you say: Virtually no curriculum</p> <p>4 instruct students in options and techniques for</p> <p>5 generating and multiplying mutual pleasure, which is</p> <p>6 what sexuality should really be about.</p> <p>7 Did I read that correctly?</p> <p>8 A. Yes. That's a point that a lot of scholars</p> <p>9 examining American sex education make. I mean, Judith</p> <p>10 Levine, Janice Irvine.</p> <p>11 Q. Is it your -- is it your position, then, that</p> <p>12 sex education curriculum in the public school system</p> <p>13 should be teaching techniques for generating and mul --</p> <p>14 multiplying mutual pleasure, such as masturbation</p> <p>15 techniques, oral sex techniques, anal penetration</p> <p>16 techniques; things of that nature?</p> <p>17 A. Surgeon General Joycelyn Elders recommended it</p> <p>18 include masturbation.</p> <p>19 Q. Okay. And you agree with that, that should be</p> <p>20 part of sex education?</p> <p>21 A. Yes, just as the -- the risks and dangers</p> <p>22 should. I think it should be a mix of -- of what sex</p> <p>23 can offer that is good and, you know, what the risks</p> <p>24 are.</p> <p>25 Q. Let's go on to the next paragraph: Sex</p>
<p style="text-align: right;">Page 123</p> <p>1 to much of the rest of the U.S.</p> <p>2 Q. So, you -- you would agree that those are</p> <p>3 proper subjects in sex education, right, unplanned --</p> <p>4 A. Oh, yes. It --</p> <p>5 Q. -- pregnancy --</p> <p>6 A. -- should be included.</p> <p>7 Q. -- and sexually transmitted diseases?</p> <p>8 A. It should be included, but it should not be the</p> <p>9 only thing, 'cause if you make it the only thing, that</p> <p>10 fright -- frightens young people and makes them consider</p> <p>11 sex dangerous and -- and something that's going to be</p> <p>12 traumatic, and I don't think that's psychologically</p> <p>13 healthy.</p> <p>14 Q. Isn't sex a little dangerous?</p> <p>15 A. Life is a little dangerous. In fact, more than</p> <p>16 a little.</p> <p>17 Q. Life doesn't create babies; sex does. So,</p> <p>18 isn't sex a little dangerous for kids?</p> <p>19 MR. SIBLEY: Objection.</p> <p>20 A. Unprotected sex is.</p> <p>21 Q. (BY MR. PRINGLE, JR.) But you're say --</p> <p>22 A. Sex without birth control is.</p> <p>23 Q. You go on to criticize the curriculum in public</p> <p>24 school systems --</p> <p>25 A. Uh-huh.</p>	<p style="text-align: right;">Page 125</p> <p>1 education is always awkward within the nuclear family,</p> <p>2 where any positive discussion of sex gives off a whiff</p> <p>3 of incest.</p> <p>4 What does that mean? Somebody talks about</p> <p>5 incest, you think that dad wants to screw you?</p> <p>6 A. No, that's not what I say. But, if -- if, you</p> <p>7 know, parents encourage or appear to be encouraging of</p> <p>8 sexual activity among their kids, particularly sexual</p> <p>9 activity of a certain sort, that can be very</p> <p>10 uncomfortable for them.</p> <p>11 Q. You think sex education in the nuclear family</p> <p>12 should be the parents encouraging their kids in sexual</p> <p>13 activity?</p> <p>14 A. No. I think it's better left to someone whom</p> <p>15 the parents trust who is outside the fam -- immediate</p> <p>16 family.</p> <p>17 Q. So, why does --</p> <p>18 A. And that's why it should be part of a</p> <p>19 curriculum in high school.</p> <p>20 Q. Why does positive discussion of sex give off a</p> <p>21 whiff of incest? I don't get that at all.</p> <p>22 A. All I can say is that my experience as an</p> <p>23 adolescent was I was very uncomfortable any time my</p> <p>24 parents talked about it.</p> <p>25 Q. Okay. That's a sample size --</p>

May 25, 2021

126 to 129

<p style="text-align: right;">Page 126</p> <p>1 A. Being --</p> <p>2 Q. -- of one.</p> <p>3 A. -- be -- well, yes, but I think it's probably</p> <p>4 an experience a lot of gay teenagers have, given that</p> <p>5 their parents have, in most cases, no experience of</p> <p>6 being sexual . . .</p> <p>7 Q. But you say: Any positive discussion of sex</p> <p>8 gives off a whiff of incest.</p> <p>9 You're basing that just on your own</p> <p>10 personal experience and nothing else?</p> <p>11 A. Well, my experience and the experience of -- of</p> <p>12 other gay men I know. I'm primarily thinking about gays</p> <p>13 there.</p> <p>14 Q. And -- and you say: This pedagogical</p> <p>15 mentorship by someone older, trusted, admired friend</p> <p>16 such a bad idea? Can you --</p> <p>17 A. I'm ask -- I'm asking questions; I'm not giving</p> <p>18 answers.</p> <p>19 Q. I know. But when you ask if it's such a bad</p> <p>20 idea, doesn't that suggest it may not be a bad idea?</p> <p>21 A. I mean, show me where on the page this says --</p> <p>22 Q. It says: "In this context, is pedagogical</p> <p>23 mentorship by someone older, trusted and admired friend</p> <p>24 such a bad idea?"</p> <p>25 A. It's a good question.</p>	<p style="text-align: right;">Page 128</p> <p>1 also need to note what I say there about primate</p> <p>2 behavior, which was discussed in an earlier article in</p> <p>3 the special issue.</p> <p>4 Q. I'm gonna get there. I haven't gotten there</p> <p>5 yet.</p> <p>6 A. Well, I mean it's entirely relevant to that</p> <p>7 question.</p> <p>8 Q. Okay. So, have you answered that question? Is</p> <p>9 pedagogical mentorship by an older, trusted, and admired</p> <p>10 friend a bad idea? And doesn't one learn by doing?</p> <p>11 Doesn't one learn to have sex by having sex with an</p> <p>12 older, trusted, and admired friend?</p> <p>13 A. Well, where do you say that I ask that?</p> <p>14 Q. I'm waiting. I'm waiting for your answer.</p> <p>15 A. I don't know the answers. I pose questions;</p> <p>16 that's what scholars do.</p> <p>17 Q. So, you pose this question, and you don't</p> <p>18 answer it?</p> <p>19 A. I am epistemologically humble.</p> <p>20 Q. Well, I don't have an -- no idea what that</p> <p>21 means.</p> <p>22 A. I -- I've told you I don't --</p> <p>23 Q. I told you the history --</p> <p>24 A. -- know all the answer. I don't know all the</p> <p>25 answers. I -- I -- I pose questions to help people get</p>
<p style="text-align: right;">Page 127</p> <p>1 Q. You asked it.</p> <p>2 A. I don't necessarily have the answer.</p> <p>3 Q. Well, isn't -- isn't the comp -- isn't the gist</p> <p>4 of that question questioning whether it's a bad idea or</p> <p>5 not?</p> <p>6 A. Yes --</p> <p>7 Q. Okay.</p> <p>8 A. -- in a situation of pedagogical mentorship.</p> <p>9 Now, not all sexual relations between adults and</p> <p>10 adolescents are that.</p> <p>11 Q. Well, you're talking about positive sex --</p> <p>12 positive discussions of sex, and then your next sentence</p> <p>13 says, "As with most other skills, doesn't one learn by</p> <p>14 doing?"</p> <p>15 Are you suggesting that one learns sex by</p> <p>16 performing sex?</p> <p>17 A. Yes.</p> <p>18 Q. And does this just follow your question about</p> <p>19 mentorship by older, trusted, and admired friend?</p> <p>20 A. Yes.</p> <p>21 Q. And so are you suggesting that young boys could</p> <p>22 learn those skills by engaging them with a older,</p> <p>23 trusted, mature sexual partner?</p> <p>24 A. I think they would -- it would be more</p> <p>25 pedagogical to someone more experienced, yes. And you</p>	<p style="text-align: right;">Page 129</p> <p>1 outside the box of their own received assumptions.</p> <p>2 Q. So, then --</p> <p>3 A. And that disturbs some people, but it's what</p> <p>4 intellectuals do.</p> <p>5 Q. So, as we sit here today, you don't know your</p> <p>6 position about whether or not pedagogical member --</p> <p>7 mentorship with an older, trusted, and admired friend is</p> <p>8 a bad idea?</p> <p>9 A. Well, I would say, if by pedagogical</p> <p>10 mentorship, we are talking about mentorship in -- in all</p> <p>11 respects. It usually is a good idea. Now, if we're</p> <p>12 talking specifically about sexual pedagogy --</p> <p>13 Q. Which is what you're talking about here.</p> <p>14 A. -- is, that -- it's still formulated as a</p> <p>15 question to which I do not have a certain answer.</p> <p>16 Q. So, you can't answer that idea, whether it's a</p> <p>17 good idea for young people to learn by doing, by having</p> <p>18 sex with an older man; you just don't know?</p> <p>19 A. Can I talk about the primate behavior that is</p> <p>20 part of this sentence? That will explain my answer.</p> <p>21 Q. I need an answer to that. Do -- do you know</p> <p>22 whether you have an answer to that question?</p> <p>23 A. I cannot answer it unless I'm allowed to</p> <p>24 explain the whole sentence.</p> <p>25 Q. Okay. Let's -- you want to talk about the</p>

<p style="text-align: right;">Page 130</p> <p>1 monkeys, talk about the monkeys. Go ahead.</p> <p>2 A. Well, actually we're talking about the greater</p> <p>3 apes.</p> <p>4 Q. Okay.</p> <p>5 A. And what the zoological studies have shown is</p> <p>6 that relationships between an older and stronger ape and</p> <p>7 a younger one, whose development is approximately equal</p> <p>8 to the adolescent stage in humans, that -- that such</p> <p>9 same sex relationships and also opposite sex</p> <p>10 relationships are quite common in the behavior of our</p> <p>11 evolution -- of our most direct evolutionary ancestors.</p> <p>12 And what the studies have shown, that it</p> <p>13 is that if apes have absolutely no experience as</p> <p>14 adolescents, that they are not capable of mating then</p> <p>15 when they become adult. And it also shows that it's</p> <p>16 very seldom that adolescent stage apes have sex with</p> <p>17 other adolescent stage apes. It is usually with an ape</p> <p>18 who is older and stronger and can help protect them in</p> <p>19 the very competitive communities that colonies of apes</p> <p>20 tend to be. That's what the zoology and evolutionary</p> <p>21 biology shows.</p> <p>22 Q. Perfect. Let's go on to the next sentence.</p> <p>23 And again, you're still talking about the -- the skills</p> <p>24 and the benefits of personal, intimate relations between</p> <p>25 adult males and 14-year-old boys.</p>	<p style="text-align: right;">Page 132</p> <p>1 answer them.</p> <p>2 A. I'm posing a rhetorical question as an answer.</p> <p>3 Q. Okay. And I'll take that.</p> <p>4 A. And all of these are rhetorical questions.</p> <p>5 Q. Yeah. But your position is, young men learn</p> <p>6 the most about sex from having sex with older men?</p> <p>7 A. I certainly did.</p> <p>8 Q. And that's an advantage of those pederastic</p> <p>9 relationships.</p> <p>10 A. I believe so. An advantage of many of them, as</p> <p>11 long as there's no coercion, or manipulation, or legal</p> <p>12 village.</p> <p>13 Q. Then, you go on to say -- you -- you -- and</p> <p>14 this is where you -- on the next page. This is page</p> <p>15 136. You talk about Dr. Rind?</p> <p>16 A. Uh-huh.</p> <p>17 Q. You say: Most gay or bisexual men who as</p> <p>18 underage children had sexual relationships with a</p> <p>19 significantly older partner rate the relationship with</p> <p>20 somewhat positive in their development if it was</p> <p>21 noncoercive and sustained, correct?</p> <p>22 A. Yes, that's this 2001 article.</p> <p>23 Q. Right.</p> <p>24 A. Which was based on Rich Savin-Williams' work.</p> <p>25 Q. And there was some controversy about</p>
<p style="text-align: right;">Page 131</p> <p>1 You -- you asked the question: Doesn't</p> <p>2 one learn the most from those who are already</p> <p>3 experienced rather than some other -- from other</p> <p>4 blundering ill-informed, emotionally immature teenagers?</p> <p>5 A. It's a good question.</p> <p>6 Q. Yeah, and you say: Doesn't one learn the most?</p> <p>7 You think they do learn the most? That --</p> <p>8 that youths can learn the most about sex from an adult?</p> <p>9 You show them the ropes, whose already experienced</p> <p>10 rather than those other blundering teenagers?</p> <p>11 A. Isn't it obvious?</p> <p>12 Q. You believe that?</p> <p>13 A. Oh. I -- it's obvious in all matters, that one</p> <p>14 learns more from someone who is experienced and more</p> <p>15 mature than from someone who is equally unexperienced</p> <p>16 and immature.</p> <p>17 Q. So, you meant --</p> <p>18 A. I mean, that -- that's a true -- it's almost a</p> <p>19 truism.</p> <p>20 Q. If you say-so.</p> <p>21 You ask --</p> <p>22 A. I mean, do -- do you think kids get better</p> <p>23 education about sex from other kids than they do from</p> <p>24 adults.</p> <p>25 Q. See, I get to ask the questions; you get to</p>	<p style="text-align: right;">Page 133</p> <p>1 publication of that article, correct?</p> <p>2 A. No, there was not.</p> <p>3 Q. And do you know Dr. Rind?</p> <p>4 A. Yes, I do.</p> <p>5 Q. And how do you know him?</p> <p>6 A. I first met him when I was a fellow at the</p> <p>7 Institute for Advanced Study in Princeton, because he</p> <p>8 lives in Philadelphia.</p> <p>9 Q. And so that would've been what, in --</p> <p>10 A. 2002.</p> <p>11 Q. So, you've known Dr. Rind since 2002, and</p> <p>12 Dr. Rind's from Philadelphia?</p> <p>13 A. Yes.</p> <p>14 Q. And how often do you see Dr. Rind?</p> <p>15 A. Well --</p> <p>16 Q. Can -- can I -- can I --</p> <p>17 A. -- maybe once a year or so.</p> <p>18 Q. I was gonna broaden that to how often do you</p> <p>19 have contact with him?</p> <p>20 A. Oh. I mean, he and I talk on the phone and --</p> <p>21 and communicate via e-mail rather often.</p> <p>22 Q. Daily? Weekly? Monthly?</p> <p>23 A. Oh, certainly not daily; maybe monthly.</p> <p>24 Q. Okay. And Dr. Rind, has he ever been a member</p> <p>25 of NAMBLA?</p>

May 25, 2021

134 to 137

<p style="text-align: right;">Page 134</p> <p>1 A. Not that I know of.</p> <p>2 Q. Have you ever asked him?</p> <p>3 A. No.</p> <p>4 Q. Had -- has Dr. Rind ever spoken at NAMBLA?</p> <p>5 A. Not that I know of.</p> <p>6 Q. Have you ever asked him?</p> <p>7 A. No.</p> <p>8 Q. Has Dr. Rind come under any sort of criticism</p> <p>9 for his studies?</p> <p>10 A. Yes, certainly.</p> <p>11 Q. Okay. You go on to say --</p> <p>12 A. Criticism by -- I mean, the only two articles</p> <p>13 that attacked his studies were by some psychologists who</p> <p>14 believe in recovered memory syndrome and multiple</p> <p>15 personality disorder, and, you know, the -- these</p> <p>16 strange phenomena that have been thoroughly debunked in</p> <p>17 psychology. His article was published in Psychological</p> <p>18 Bulletin, which is the top rated academic journal in</p> <p>19 that field. It was subjected to -- now because of the</p> <p>20 political objections, it was subjected to the deet -- a</p> <p>21 special issue of that journal later on. It was looked</p> <p>22 into by the American Academy of Sciences, and -- and all</p> <p>23 of those concluded that this was unproblematic.</p> <p>24 MR. PRINGLE, JR.: Objection,</p> <p>25 nonresponsive.</p>	<p style="text-align: right;">Page 136</p> <p>1 answer that question? Have we set up a legal regime</p> <p>2 that does unnecessary harm to underage males by imposing</p> <p>3 an age of consent on them that prevents them from</p> <p>4 hooking up with adult males?</p> <p>5 A. I think in the case of -- of gay adolescents,</p> <p>6 may -- gay male adolescents, who are the ones that I'm</p> <p>7 primarily concerned with in my work, I -- I think, lack</p> <p>8 of -- of sexual experimentation is psychologically</p> <p>9 probable, and this is often not feasible with their own</p> <p>10 couverts. I -- I -- I mean, numerous studies have shown</p> <p>11 that gay boys tend to have sex at an earlier age than</p> <p>12 heterosexual boys and that their partners tend to be</p> <p>13 older than the partners of heterosexual boys.</p> <p>14 MR. PRINGLE, JR.: Objection,</p> <p>15 nonresponsive.</p> <p>16 Q. (BY MR. PRINGLE, JR.) So, is the answer to that</p> <p>17 question "yes," that in our zeal to protect vulnerable</p> <p>18 underage females, you've set up a regime that does</p> <p>19 unnecessary harm to underage males by suppressing and</p> <p>20 even punishing their sexual urges?</p> <p>21 A. I -- I will stand by my answer that --</p> <p>22 Q. Is that "yes"?</p> <p>23 A. -- you said was nonresponsive.</p> <p>24 Q. But is it "yes," that we have to atone for</p> <p>25 them? That's all I want to know.</p>
<p style="text-align: right;">Page 135</p> <p>1 Q. (BY MR. PRINGLE, JR.) You go on to -- if I pose</p> <p>2 the question again -- question but no answer -- but you</p> <p>3 say -- and I'm reading from here.</p> <p>4 A. Uh-huh.</p> <p>5 Q. Right before III.</p> <p>6 A. Uh-huh.</p> <p>7 Q. You ask: "Could it be that in our zeal to</p> <p>8 predict vulnerable underage females, we have set up a</p> <p>9 legal regime that does unnecessary harm to underage</p> <p>10 males by suppressing and even punishing the entirely</p> <p>11 natural and powerful sexual urges that every male feels</p> <p>12 at the age of puberty, but cannot always fulfill with</p> <p>13 partners his own age?"</p> <p>14 A. Yes.</p> <p>15 Q. Do you have any --</p> <p>16 A. This is particularly true for gay males who</p> <p>17 are -- are reluctant to come out among their high school</p> <p>18 peers.</p> <p>19 Q. And so your position is, if it isn't for those</p> <p>20 gay males, adult males is often all they have?</p> <p>21 A. Yes, that's why so many of them go on to these</p> <p>22 hook-up cites pretending to be 18, when they're not.</p> <p>23 MR. PRINGLE, JR.: Objection,</p> <p>24 nonresponsive.</p> <p>25 Q. (BY MR. PRINGLE, JR.) So -- okay. So, can you</p>	<p style="text-align: right;">Page 137</p> <p>1 A. The answer is more complex than a simple "yes"</p> <p>2 or "no."</p> <p>3 Q. Is it more "yes" than "no"?</p> <p>4 A. There is evidence that it could be a "yes."</p> <p>5 I -- I'm not aware of the evidence that it is likely</p> <p>6 "no," but if you want to present it to me, I will</p> <p>7 consider it and respond. Where -- where -- where is</p> <p>8 your evidence that it's not?</p> <p>9 Q. Did you quantify the sentence by limiting it to</p> <p>10 the -- to the young gay males that you're concerned</p> <p>11 with, or is it a -- does your sentence apply to all</p> <p>12 boys?</p> <p>13 A. It would apply to heterosexual boys who might</p> <p>14 want an experience of -- with an adult woman, given</p> <p>15 that, you know, the -- the -- the models of female</p> <p>16 beauty that we have in our society are often, you know,</p> <p>17 actresses or models.</p> <p>18 I remember back when I was growing up, it</p> <p>19 was Raquel Welch that all of us wanted to -- or -- or</p> <p>20 that those of us who were heterosexual wanted to be</p> <p>21 with, and even I found Raquel Welch very attractive.</p> <p>22 I -- I've had some heterosexual men tell</p> <p>23 me that their relationship with a sympathetic adult</p> <p>24 female is what saved their life and that otherwise they</p> <p>25 would've committed suicide. So, yes, when you're</p>

May 25, 2021

138 to 141

<p style="text-align: right;">Page 138</p> <p>1 talkings needs to be timed, I -- I believe that this</p> <p>2 applies to heterosexual boys in relation with -- with --</p> <p>3 with women.</p> <p>4 Studies have shown that, you know, by the</p> <p>5 age of 12 or 13, the vast majority of boys and even</p> <p>6 girls have seen online pornography, and all of the</p> <p>7 models practicing sex, very raw sex are adults. So,</p> <p>8 it -- it -- it's -- it's not unreasonable that that is</p> <p>9 what they would associate with being sexually attractive</p> <p>10 and -- as opposed to some skinny, silly high school</p> <p>11 girl.</p> <p>12 MR. PRINGLE, JR.: Objection</p> <p>13 nonresponsive.</p> <p>14 Q. (BY MR. PRINGLE, JR.) Let's go on to the next</p> <p>15 page. It's actually page 138. It's a -- this is --</p> <p>16 this is at the end of a discussion about the historical</p> <p>17 evolution of the age of consent law. Are you with me?</p> <p>18 A. Yes, the historical evolution of the United</p> <p>19 States and the U.K.</p> <p>20 Q. Yes.</p> <p>21 You say: "Many of the sad by-products of</p> <p>22 the naive and self-righteous era, including the laws on</p> <p>23 age of consent, linger with us."</p> <p>24 A. What part of the page?</p> <p>25 Q. Middle of the page on page -- it's the last</p>	<p style="text-align: right;">Page 140</p> <p>1 driver's license?</p> <p>2 THE REPORTER: I'm sorry, before he can?</p> <p>3 MR. PRINGLE, JR.: Get a driver's license.</p> <p>4 THE REPORTER: Thank you.</p> <p>5 A. The Greek evidence and the evidence of many</p> <p>6 other cultures where the age of consent is 14 or 15 do</p> <p>7 suggest that.</p> <p>8 Q. (BY MR. PRINGLE, JR.) Well, the Greeks didn't</p> <p>9 have a driver's license, did they?</p> <p>10 A. But -- but what the evidence does show is that</p> <p>11 before the age of 16.</p> <p>12 Q. And -- and your position is, it's a sad</p> <p>13 by-product of an earlier age because the evidence is, is</p> <p>14 that a proper age of consent or a better age of consent,</p> <p>15 as you've articulated it, is 14 or 15 before they can</p> <p>16 get a driver's license?</p> <p>17 A. Yes, I -- I -- I don't see what driving has to</p> <p>18 do with a boy's sexual urges. These are completely</p> <p>19 different realms of -- of activity.</p> <p>20 Q. Do you know why people have to wait till</p> <p>21 they're 16 to get a driver's license?</p> <p>22 A. It -- it has to do with issues, like, height</p> <p>23 and --</p> <p>24 Q. Height? You say "height"?</p> <p>25 A. Well, someone who's 4-feet tall has trouble</p>
<p style="text-align: right;">Page 139</p> <p>1 part of that paragraph, on page 139 -- 8.</p> <p>2 A. Yes, this is in the context of prohibition</p> <p>3 being counterproductive and the war on drugs being</p> <p>4 counterproductive.</p> <p>5 Q. So, you -- you continue to say, and I think you</p> <p>6 testified earlier, that they were a legal fiction, that</p> <p>7 the laws on the age of consent are a sad by-product of</p> <p>8 earlier, uninformed times?</p> <p>9 MR. SIBLEY: Objection.</p> <p>10 A. Well, I -- I explained the historical origin of</p> <p>11 raising the age of consent from what used to be 10 or</p> <p>12 12, in all American states, to 16 or 18, which, you</p> <p>13 know, that campaign began in the 1880s and continued</p> <p>14 into the Progressive era. And, yes, I -- I -- I do</p> <p>15 think that that time was one that had a lot of attitudes</p> <p>16 toward sexuality that no longer characterize our simple</p> <p>17 age today.</p> <p>18 Q. (BY MR. PRINGLE, JR.) And why is that</p> <p>19 by-product sad?</p> <p>20 A. I, as a Libertarian, I think all efforts to</p> <p>21 regulate sexual behavior by people who are cognizant</p> <p>22 enough to assert consent and nonconsent are a</p> <p>23 fundamental violation of human freedom and will.</p> <p>24 Q. And so you believe that a -- a child can --</p> <p>25 should be able to give consent before he can get a</p>	<p style="text-align: right;">Page 141</p> <p>1 driving a car. It -- it has to do with the greater</p> <p>2 likelihood of them getting into accidents.</p> <p>3 Q. Why is that?</p> <p>4 A. Because of inexperience.</p> <p>5 Q. And judgment?</p> <p>6 A. Yes, perhaps.</p> <p>7 Q. Do you think that's one reason for these sad</p> <p>8 by-products of the age of consent is a boy who's 14</p> <p>9 maybe doesn't have a real good judgment yet?</p> <p>10 MR. SIBLEY: Objection.</p> <p>11 A. All we can do is look at the evidence of</p> <p>12 countries or historical cultures where they did have</p> <p>13 that freedom at the age of 14 or 15.</p> <p>14 Q. (BY MR. PRINGLE, JR.) But -- but that's not my</p> <p>15 question. Do you think that's one reason for the</p> <p>16 current age of consent, because a child of 14 doesn't</p> <p>17 have a fully formed sense of judgment?</p> <p>18 A. Well, that's the reason that some people would</p> <p>19 cite. I happen to think it's incorrect.</p> <p>20 Q. Okay. And on page 141 now of this article.</p> <p>21 A. Yes.</p> <p>22 Q. Now, the feminist -- at the top of the page.</p> <p>23 "Feminist advocacy of gender-neutral</p> <p>24 language was not based on any evidence that sex between</p> <p>25 adolescent boys and adult women (or for that matter</p>

May 25, 2021

142 to 145

<p style="text-align: right;">Page 142</p> <p>1 adult men) was necessarily or even harmful to boys --</p> <p>2 usually harmful to boys."</p> <p>3 A. Yes, that's correct.</p> <p>4 Q. You haven't seen any evidence that sex between</p> <p>5 adult men and adolescent boys is ever or mutually</p> <p>6 harmful to boys?</p> <p>7 A. Oh, it -- it sometimes is. But again, the</p> <p>8 studies that I have seen suggest that in the majority of</p> <p>9 cases, if it is non -- if it is not coercive, it -- it</p> <p>10 is not harmful. I mean, there have been studies, for</p> <p>11 example, that have compared three -- I mean, it's been</p> <p>12 studied in the archives of sexual behavior in the last</p> <p>13 few years examining the differences between three</p> <p>14 populations of the people whose first sexual experience</p> <p>15 was with a peer of the same age, those who first --</p> <p>16 whose first sexual experience was as an adolescent with</p> <p>17 an adult, and those whose sexual experience -- whose</p> <p>18 first sexual experience did not occur until they were an</p> <p>19 adult with another adult. And what those studies show</p> <p>20 is that the later psychological adjustment of those</p> <p>21 three populations was, approximately, the same. There</p> <p>22 is no statistical difference.</p> <p>23 And moreover, that in terms of sexual</p> <p>24 functioning, by which we mean things like erectile</p> <p>25 dysfunction and the compulsivity, that, actually, the</p>	<p style="text-align: right;">Page 144</p> <p>1 gender-neutral language prevents the young boy, the 14</p> <p>2 year old, from having sex -- consensual sexual relations</p> <p>3 with an older and more adept man, true?</p> <p>4 A. Yes. There was -- I mean when state</p> <p>5 legislatures considered incorporating gender-neutral</p> <p>6 language into the age of consent laws, it was not based</p> <p>7 upon any scientific testimony.</p> <p>8 Q. And you consider those sexual relations between</p> <p>9 the 14-year-old boy and the adult man as, quote, proper</p> <p>10 learning experiences, is -- be included within that</p> <p>11 group?</p> <p>12 A. The word "proper" also means properly defined.</p> <p>13 Look at the Oxford English Dictionary, III. Experiences</p> <p>14 that can be properly defined as learning experiences.</p> <p>15 Now not all sexual relations are.</p> <p>16 Q. But it's clear that you're referring here to</p> <p>17 proper learning experiences as relations between teen</p> <p>18 boys and adult men, among others, true?</p> <p>19 A. Experiences that are properly defined as</p> <p>20 learning experiences.</p> <p>21 Q. Well, I'm -- I -- where does it --</p> <p>22 A. O-E --</p> <p>23 Q. -- say "defined"? I -- I didn't see that.</p> <p>24 Where is that?</p> <p>25 A. That is the definition of the word proper in</p>
<p style="text-align: right;">Page 143</p> <p>1 group that rated the highest were those who, as</p> <p>2 adolescents, had their first relationship with an adult.</p> <p>3 So, yes, there -- there is no evidence that it is</p> <p>4 harmful in most cases, as long as it is consensual and</p> <p>5 legal. Now, it can be very harmful if it's illegal.</p> <p>6 Q. And consent is often in the eye of the</p> <p>7 beholder?</p> <p>8 A. I think we have to trust the judgment of the</p> <p>9 party who gave consent.</p> <p>10 Q. Trust the judgment of the 14-year-old boy, in</p> <p>11 our example, correct?</p> <p>12 A. If he says that he himself pursued it or went</p> <p>13 along with it and desired it, I -- I -- I -- I think we</p> <p>14 have to trust that, particularly if he says that once he</p> <p>15 is of adult age and has more understanding.</p> <p>16 Q. So, let's go to top of page 143.</p> <p>17 You say: The linking of gender-neutral</p> <p>18 language with age-span provisions has had the effect of</p> <p>19 legitimizing relationships between bumbling and</p> <p>20 insensitive teenagers at the -- at the same time they</p> <p>21 have prevented teenage boys from engaging in proper</p> <p>22 learning experiences (physical and emotional) with</p> <p>23 somewhat older and more adept partners.</p> <p>24 A. Yes, I would stand by that.</p> <p>25 Q. So, part of your criticism here is this</p>	<p style="text-align: right;">Page 145</p> <p>1 OED, III, under that word: So whereupon.</p> <p>2 Q. So, are these learning experiences proper or</p> <p>3 not?</p> <p>4 A. They are properly defined as learning. See,</p> <p>5 I'm -- you see, I'm adding a contingency there.</p> <p>6 Q. Proper is -- proper is what? It's an</p> <p>7 adjective?</p> <p>8 A. Yes.</p> <p>9 Q. And what does it modify?</p> <p>10 A. Nouns.</p> <p>11 Q. The learning experience?</p> <p>12 A. Yes.</p> <p>13 Q. So, you're saying that the learning experience</p> <p>14 was proper, right?</p> <p>15 A. The word "proper" has more than one definition.</p> <p>16 Q. But you're using it as an agentive, aren't you?</p> <p>17 A. It has more than one definition as an all --</p> <p>18 add -- adjective. Just look up the LED article. I</p> <p>19 mean, it has, at least, three meanings. Its original</p> <p>20 meaning is derived from the Latin proper use which means</p> <p>21 one's own.</p> <p>22 Q. Okay.</p> <p>23 A. I mean, it is not necessarily saying it</p> <p>24 means --</p> <p>25 Q. Is that what you meant, one's own learning</p>

<p style="text-align: right;">Page 146</p> <p>1 experience?</p> <p>2 A. No. What I meant was OED, 3, properly defined.</p> <p>3 Properly speaking. That is the definition of "proper"</p> <p>4 even as an adjective.</p> <p>5 Q. And so you would agree that someone reading</p> <p>6 this perusing your text might come away with the</p> <p>7 impression that this sentence means that you believe</p> <p>8 that sex between boy -- teen boys and adult men can be a</p> <p>9 proper learning experience, the phrase you used?</p> <p>10 A. I don't believe someone would believe that who</p> <p>11 has read the whole article with care.</p> <p>12 Q. You think somebody --</p> <p>13 A. And who --</p> <p>14 Q. -- might believe that who's met you?</p> <p>15 A. Someone who has met me?</p> <p>16 Q. Yeah, met you and knows you as they talk to</p> <p>17 you.</p> <p>18 A. If they have talked with me about these issues,</p> <p>19 I would make it very clear to them that I strongly</p> <p>20 advise against anyone having a relationship with an</p> <p>21 adolescent in today's society in the United States.</p> <p>22 Q. That would be an improper learning experience,</p> <p>23 wouldn't it?</p> <p>24 A. Because it is unlawful.</p> <p>25 Q. Okay. So, sex between an adult male and a teen</p>	<p style="text-align: right;">Page 148</p> <p>1 definition of the word.</p> <p>2 Q. Let's go on to the next page, page 144. You</p> <p>3 ask -- you pose the question: Would the social cost not</p> <p>4 be less if we erected stronger barriers to sex between</p> <p>5 teenage boys and girls, but opened up boys to other</p> <p>6 safer sexual outlets now denied them, such as the</p> <p>7 freedom to associate it with adult women or gay and</p> <p>8 bisexual men.</p> <p>9 A. Yes.</p> <p>10 Q. So, you pose that question. Can you answer it?</p> <p>11 A. Well, again, it's a rhetorical question, like</p> <p>12 most of the questions that I ask in this essay; but I --</p> <p>13 I think it cannot be denied that sex between teenage</p> <p>14 boys and girls is one of the most risky forms, in -- in</p> <p>15 terms of lack of proper protection, lack of birth</p> <p>16 control, which is not readily available to most teenage</p> <p>17 girls -- although it is almost universally prescribed in</p> <p>18 Europe as soon as a girl reaches the age of puberty --</p> <p>19 and it is also more risky in reso -- in the possibility</p> <p>20 that it is somehow forcible sex. As I've told you</p> <p>21 before, the most common ages at which men commit rape</p> <p>22 are 17 and 18.</p> <p>23 Q. Yeah, you've told me that.</p> <p>24 MR. PRINGLE, JR.: Objection,</p> <p>25 nonresponsive.</p>
<p style="text-align: right;">Page 147</p> <p>1 boy would be an improper learning experience, wouldn't</p> <p>2 it?</p> <p>3 MR. SIBLEY: Objection.</p> <p>4 A. In the United States today.</p> <p>5 Q. (BY MR. PRINGLE, JR.) Okay. It wouldn't be a</p> <p>6 proper learning experience, as you've described it; it</p> <p>7 would be improper.</p> <p>8 MR. SIBLEY: Objection.</p> <p>9 A. What I described was OED, III, something that</p> <p>10 is properly defined as a learning experience; that is</p> <p>11 what I meant. Now, I can see the possibility where a</p> <p>12 naive reader who isn't very bright might misinterpret,</p> <p>13 you know, my words. And, in retrospect, maybe I</p> <p>14 should've said "properly learning experiences."</p> <p>15 Q. (BY MR. PRINGLE, JR.) Say that again.</p> <p>16 A. Maybe I should've used the adverb "properly."</p> <p>17 Q. Let's -- let's see how that reads.</p> <p>18 "They have prevented teenage boys from</p> <p>19 engaging in properly learning experience."</p> <p>20 What does that mean, "properly learning</p> <p>21 experience"?</p> <p>22 A. Properly defined as.</p> <p>23 Q. Oh. You just left out three words there?</p> <p>24 A. No, I'm using the adjective "proper" correctly.</p> <p>25 Just look up OED, III. You'll see that that is a</p>	<p style="text-align: right;">Page 149</p> <p>1 Q. (BY MR. PRINGLE, JR.) So, the question that</p> <p>2 you're asking is, wouldn't society be better off if we</p> <p>3 discouraged sex between teenage boys and girls and</p> <p>4 provided boys an opportunity to have sex with adult</p> <p>5 women and adult men?</p> <p>6 A. That is the question, yes.</p> <p>7 Q. Okay. And then you go on to say: Why should</p> <p>8 we assume that better sex is going to occur among two</p> <p>9 equally awkward ill-informed, inexperienced partners</p> <p>10 when, at least, that -- then in those situation where,</p> <p>11 at least, one partner know what they're doing, right?</p> <p>12 A. I asked that question.</p> <p>13 Q. Okay. So, you suggest that probably those</p> <p>14 children, those underage boys and girls, might have</p> <p>15 better sex with adults?</p> <p>16 A. It is a possibility --</p> <p>17 Q. Well --</p> <p>18 A. -- but I -- I would not call teenagers</p> <p>19 "children." I think that's very condescending.</p> <p>20 Q. Well, what -- why are you concerned whether</p> <p>21 those 14-year-old boys that I'm gonna call "children"</p> <p>22 have good sex? Why are you worried about that?</p> <p>23 A. I'd rather they have good sex than bad sex.</p> <p>24 Q. Why do you think that they're gonna have better</p> <p>25 sex with adults than they will with children?</p>

May 25, 2021

150 to 153

<p style="text-align: right;">Page 150</p> <p>1 A. I just explained it to you, and you said it was 2 nonresponsive.</p> <p>3 Q. And what was your answer, because they know 4 what they're doing?</p> <p>5 A. One, the possibility of rape is greater in the 6 case of young people. Second, the lack of birth control 7 is more common in the case of teenage girls; and third, 8 the lack of proper prophylactic technology to prevent 9 STDs is -- tends to be a problem when it's a teenage boy 10 and a teenage girl for that matter. Whereas more 11 experienced women and men know more about this.</p> <p>12 Q. You also go on to say that we readily -- too 13 readily forget the traditional rites of passage involve 14 adults leading as -- adolescents into the new world of 15 grown-up knowledge and skills --</p> <p>16 A. Yes.</p> <p>17 Q. -- including sex.</p> <p>18 Are -- I guess you're questioning 19 shouldn't that be applic -- shouldn't that phenomena be 20 applicable to sex as well?</p> <p>21 A. Well, you're making an inference. I mean, I 22 don't say that specifically.</p> <p>23 Q. Were you making that inference?</p> <p>24 A. I'm describing rites of passage with -- which 25 is a concept in anthropology.</p>	<p style="text-align: right;">Page 152</p> <p>1 that parent -- that person more than their parent? 2 MR. SIBLEY: Objection.</p> <p>3 A. Not that I insert the word "perhaps." And in 4 cases where parents may be abusive toward their 5 children -- and child abuse by parents, whether 6 physical, or emotional, or neglect is all too common -- 7 that, yeah, wherein cases where a parent is homophobic 8 and disapproves of their -- their child's sexual 9 orientation, I -- yes, I do think that they are 10 especially suspicious of any relationship the child 11 would have with another adult.</p> <p>12 Q. (BY MR. PRINGLE, JR.) So --</p> <p>13 A. When they might not be as suspicious of a 14 relationship with an equally naive people.</p> <p>15 Q. Do you -- do you believe that the source of 16 parental paren -- panic over pedophilia is a subliminal 17 fear that their children might love and -- the pedophile 18 more than them?</p> <p>19 A. In some cases, I think that is probably the 20 case. I mean, if you understand the concept of 21 patriarchy, then -- or matriarchy for that matter, these 22 are concepts of the father or the mother treating the 23 family as personal property.</p> <p>24 MR. PRINGLE, JR.: Objection, 25 nonresponsive.</p>
<p style="text-align: right;">Page 151</p> <p>1 Q. But you're making that -- you're making -- 2 A. That -- 3 Q. -- that -- 4 A. -- that first sex is a rite of passage. 5 Q. Right. And so you're asking, whether or not -- 6 as with other rites of a passage, maybe the concept of 7 sex ought to be passed down from adult to child, true? 8 A. It is a question I pose of this essay, but we 9 should emphasize adolescents are not children, and 10 adults are not necessarily dirty old men. In most of 11 these cases, we're talking about young men or young 12 women in their 20s or late teens.</p> <p>13 Q. We're almost done here. So, one -- with this 14 article.</p> <p>15 Wage -- page 145, on the right-hand side, 16 and I'm looking at this paragraph right here.</p> <p>17 A. Uh-huh.</p> <p>18 Q. It says: Perhaps the true source of parental 19 panic over pedophilia is a subliminal fear that their 20 children might love another adult man or woman more than 21 them.</p> <p>22 A. Yes.</p> <p>23 Q. Do you think that's what people are worried 24 about with pedophilia, that maybe this person who's 25 having sex with a prepubescent child, the child may love</p>	<p style="text-align: right;">Page 153</p> <p>1 Q. (BY MR. PRINGLE, JR.) The next sentence says: 2 Instead, parents attempt to manipulate their children 3 into scripted roles of heteronormative romance among 4 age-equals, none of whom can offer the parent serious 5 competition in intellect authority or financial 6 independence.</p> <p>7 A. Yes.</p> <p>8 Q. So, you think that parents attempt to 9 manipulate their children into heterosexuality with 10 people their own age so as not to be threatened by a 11 pederast or a pedophile, earning the child's love and 12 admiration. Is that what that's saying?</p> <p>13 A. Most parents are, by definition, heterosexual. 14 And, yes, they -- they do encourage kids, 15 particularly -- even including gay kids, that 16 heterosexuality and marriage are -- are better options 17 than same-sex interactions, particularly same-sex 18 interactions with an adult.</p> <p>19 Q. And you've -- and you write here that parents 20 attempt to manipulate their children into heterosexual 21 romance among children their own age --</p> <p>22 A. Some --</p> <p>23 Q. -- age?</p> <p>24 A. -- parents do.</p> <p>25 Q. All right. Well, you don't say "some"; you</p>

May 25, 2021

154 to 157

<p style="text-align: right;">Page 154</p> <p>1 just say parents do that.</p> <p>2 A. I probably should've said "some."</p> <p>3 Q. All right. And the reason they do that is</p> <p>4 because heterosexual relationship with a child, the</p> <p>5 child's own age, can't really threaten the parents'</p> <p>6 dominate -- domination and intellect authority for</p> <p>7 financial independence?</p> <p>8 A. Yes.</p> <p>9 Q. All right. You think that the wiser form of</p> <p>10 parental love must recognize the needs of children,</p> <p>11 especially boys, to become independent and</p> <p>12 self-confident in their dealings with the world?</p> <p>13 A. Yes, I do believe that.</p> <p>14 Q. And to give them the freedom to consent to</p> <p>15 sexual relations with adult males; is --</p> <p>16 A. Or --</p> <p>17 Q. -- that --</p> <p>18 A. -- adult females.</p> <p>19 Q. Either one, true?</p> <p>20 A. I -- I believe that helicopter parenting, over</p> <p>21 involvement in trying to script and determine an</p> <p>22 adolescent's life can be very harmful. Just look at</p> <p>23 what has happened with adolescent mental health over the</p> <p>24 last four or five decades. It has gotten steadily worse</p> <p>25 and worse and worse, and a lot of this has to do with</p>	<p style="text-align: right;">Page 156</p> <p>1 exhibits to go through, and let me just ask you. I'm</p> <p>2 gonna ask you a few questions about Exhibit No. 8.</p> <p>3 MR. PRINGLE, JR.: Joe, did I give you</p> <p>4 this yet?</p> <p>5 MR. SIBLEY: I don't think so.</p> <p>6 MR. PRINGLE, JR.: Here you go.</p> <p>7 Q. (BY MR. PRINGLE, JR.) And you wrote Exhibit No.</p> <p>8 8?</p> <p>9 A. Yes.</p> <p>10 Q. And you wrote it, approximately, 2010?</p> <p>11 A. Well, again, it's probably more 2009, because</p> <p>12 there's a lag time in publication.</p> <p>13 Q. All right. And let's see. I'm gonna ask you</p> <p>14 just a couple of questions about this, one about</p> <p>15 Dr. Donald H. Mader, on page 96.</p> <p>16 A. Uh-huh. Yes. No, not doctor; reverend.</p> <p>17 Q. Reverend. Oh, you're right. Reverend Donald</p> <p>18 Mader. He is completing his doctorate in gay studies at</p> <p>19 the University of Amsterdam. I assume he's out now?</p> <p>20 A. I think he never finished.</p> <p>21 Q. Oh. What's -- do you know what he's doing now?</p> <p>22 A. It's been a number of years since I've had any</p> <p>23 contact with him, so I -- I assume he -- well, I think</p> <p>24 he told me that that church had been closed down. So, I</p> <p>25 think he's, basically, retired.</p>
<p style="text-align: right;">Page 155</p> <p>1 erotic parenting. In fact, the greatest difference in</p> <p>2 add -- in adolescent -- and I know you're gonna say</p> <p>3 "nonresponsive," but it's a --</p> <p>4 Q. Or --</p> <p>5 A. -- great --</p> <p>6 Q. -- you can just stop talking if you want.</p> <p>7 A. I --</p> <p>8 Q. Okay. Any time you -- you realize that I'm</p> <p>9 gonna say "nonresponsive," you can stop talking.</p> <p>10 A. Well, I -- I just want it on the record that --</p> <p>11 Q. You don't have to, but you should, I mean.</p> <p>12 A. I want it on the record that there are certain</p> <p>13 things that you don't want to be part of the record.</p> <p>14 Q. No. There are certain things that I didn't ask</p> <p>15 you that you're volunteering. And if your lawyer wants</p> <p>16 to ask you questions to get all those things out, he's</p> <p>17 more than welcome to; but I don't have to.</p> <p>18 MR. SIBLEY: Objection.</p> <p>19 Answer the question how you feel you need</p> <p>20 to answer it. Let's go from there.</p> <p>21 (Exhibit 8 marked)</p> <p>22 Q. (BY MR. PRINGLE, JR.) Let's look at Exhibit No.</p> <p>23 8.</p> <p>24 A. We are past 5:00 o'clock. Is it . . .</p> <p>25 Q. Yes, we are. I've got quite a few more</p>	<p style="text-align: right;">Page 157</p> <p>1 Q. Okay. So, his -- his proposition is an</p> <p>2 application to the children of an objective test to</p> <p>3 ascertain sexual knowledge and social skills and a</p> <p>4 self-assertion of their own preferences --</p> <p>5 A. Uh-huh.</p> <p>6 Q. -- right?</p> <p>7 A. Yes.</p> <p>8 Q. So, do you agree with that?</p> <p>9 A. We're talking about a test that was originally</p> <p>10 developed for the cognitively impaired.</p> <p>11 Q. And -- and do you agree with that?</p> <p>12 A. That, that could also be applied to -- to</p> <p>13 children? Yes, I think that's an interesting</p> <p>14 perspective, that if you have an adult who has the</p> <p>15 mental capacity of a 14 year old, how is that different</p> <p>16 from simply giving the test to a 14 year old with normal</p> <p>17 mental capacity?</p> <p>18 Q. And so this test is -- is given to children to</p> <p>19 ascertain their sexual knowledge and social skills</p> <p>20 coupled with an effective and thorough sex education to</p> <p>21 provide an assessment whether that child can give</p> <p>22 effective consent to sexual relations with an adult,</p> <p>23 correct?</p> <p>24 A. Yes. Mader presented an interesting idea</p> <p>25 there.</p>

May 25, 2021

158 to 161

<p style="text-align: right;">Page 158</p> <p>1 Q. And do you think that's a good idea?</p> <p>2 A. It's worth considering it.</p> <p>3 Q. Okay. And last page of this article, page 98,</p> <p>4 you say: Any hope for positive change in the way our</p> <p>5 society treats its boys and the capacity for sexual</p> <p>6 self-realization must be embedded in a wider agenda of</p> <p>7 certain things.</p> <p>8 A. Self-realization and self-control.</p> <p>9 Q. Right. And self-control.</p> <p>10 So, you're advo -- are you advocating for</p> <p>11 a positive change in the way our society treats its boys</p> <p>12 here?</p> <p>13 A. Yes. That is the whole purpose of this</p> <p>14 scholarly journal.</p> <p>15 Q. Is that the whole purpose of all of your work</p> <p>16 on pederasty is to -- shouldn't say pederasty -- on age</p> <p>17 of consent issues is positive change in the way our</p> <p>18 society treats its boys?</p> <p>19 A. Yes. My work is written mainly from the</p> <p>20 perspective of what is good for adolescent boys.</p> <p>21 Q. And that's --</p> <p>22 A. Particularly gay boys.</p> <p>23 Q. And --</p> <p>24 A. I couldn't care less about the minor attracted</p> <p>25 adults, except to the extent that, I think, putting them</p>	<p style="text-align: right;">Page 160</p> <p>1 break, please?</p> <p>2 MR. PRINGLE, JR.: We may. I'm sorry.</p> <p>3 THE REPORTER: Thank you.</p> <p>4 THE VIDEOGRAPHER: Off the record at 5:32</p> <p>5 {sic}.</p> <p>6 (Recess from 5:31 p.m. to 5:44 p.m.)</p> <p>7 THE VIDEOGRAPHER: We're back on the</p> <p>8 record at 5:44.</p> <p>9 Q. (BY MR. PRINGLE, JR.) All right. I want to</p> <p>10 change base with you, Professor, and ask you some</p> <p>11 questions about your demands for corrections and</p> <p>12 retractions.</p> <p>13 A. Yes.</p> <p>14 Q. Do you know who you made demands for retract --</p> <p>15 corrections and retractions to? Don't list them. Do</p> <p>16 you know who you made them to?</p> <p>17 A. Yes.</p> <p>18 Q. You made one to Alex Newman?</p> <p>19 A. Yes.</p> <p>20 Q. And Alex Newman is the person affiliated with a</p> <p>21 outfit called American Opinion Foundation?</p> <p>22 A. Yes, which is, my understanding, is related to</p> <p>23 the John Birch Society.</p> <p>24 Q. All right. And did -- was there ever any</p> <p>25 retraction made?</p>
<p style="text-align: right;">Page 159</p> <p>1 in prison for decades is a misuse of resources, given</p> <p>2 the lower recidivously rate.</p> <p>3 Q. And it sounds like you haven't given much</p> <p>4 consideration to the non-gay and non-bisexual minors?</p> <p>5 A. Well, in the article, we were just analyzing.</p> <p>6 I -- I do, also, talk about heterosexual boys with adult</p> <p>7 women. So, yes, I do consider that, but my main</p> <p>8 concern, as an activist and -- and -- and intellectual,</p> <p>9 is -- is with gay boys.</p> <p>10 Q. And that's what you're advocating for?</p> <p>11 A. Gay and bisexual.</p> <p>12 Q. Is -- is that what you're advocating for in</p> <p>13 these articles?</p> <p>14 A. I think that their interest should be primary.</p> <p>15 Q. All right.</p> <p>16 A. And if I believed that all relay -- sexual</p> <p>17 relationships that they have with someone a bit older</p> <p>18 were harmful, I -- I would be arguing that they should</p> <p>19 continue to be banned.</p> <p>20 MR. PRINGLE, JR.: I'm gonna mark this as</p> <p>21 Exhibit No. 9.</p> <p>22 (Exhibit 9 marked)</p> <p>23 THE REPORTER: Excuse me, sir?</p> <p>24 MR. PRINGLE, JR.: Yes?</p> <p>25 THE REPORTER: May I have a restroom</p>	<p style="text-align: right;">Page 161</p> <p>1 A. No, but they removed the article.</p> <p>2 Q. What makes you think that?</p> <p>3 A. I think when I last checked, it said, "Page no</p> <p>4 longer exists."</p> <p>5 Q. Did they pay you any money?</p> <p>6 A. No.</p> <p>7 Q. Did you ask for any money?</p> <p>8 A. Well, no. We just demanded correction,</p> <p>9 retraction, or -- whatever the third term is, and --</p> <p>10 and -- and they -- they withdrew it, which was</p> <p>11 satisfactory to us.</p> <p>12 Q. And you made a demand for retraction and</p> <p>13 correction to the Dallas Morning News?</p> <p>14 A. I did.</p> <p>15 Q. For a couple of editorials that were written</p> <p>16 about you?</p> <p>17 A. One editorial.</p> <p>18 Q. All right. And did the Dallas Morning News pay</p> <p>19 you any money?</p> <p>20 MR. SIBLEY: I'm gonna have to -- we -- we</p> <p>21 can't -- we have a -- an agreement on that, which I'm</p> <p>22 happy to produce to you, but we have to go through the</p> <p>23 notice provisions of the -- of the agreement in order to</p> <p>24 do that.</p> <p>25 THE REPORTER: I can't hear you, Counsel.</p>

May 25, 2021

162 to 165

<p style="text-align: right;">Page 162</p> <p>1 MR. SIBLEY: Yeah, we have -- we have an</p> <p>2 agreement in place that puts us in a -- potentially put</p> <p>3 us in breach if we have to disclose that information.</p> <p>4 But, if we give notice to the other party, there's a</p> <p>5 process by which we can go through to designate that</p> <p>6 confidential, and we will produce that document to</p> <p>7 Mr. Pringle, and that should be sufficient to give him</p> <p>8 his answer to -- to the question he asked.</p> <p>9 MR. PRINGLE, JR.: All right.</p> <p>10 Q. (BY MR. PRINGLE, JR.) And then we have the</p> <p>11 retraction notice to Sarah that I am going to mark as</p> <p>12 our next exhibit number . . .</p> <p>13 THE REPORTER: Ten.</p> <p>14 MR. PRINGLE, JR.: Ten.</p> <p>15 (Exhibit 10 marked)</p> <p>16 Q. (BY MR. PRINGLE, JR.) And that is the</p> <p>17 retraction letter that was sent, correct?</p> <p>18 A. Yes.</p> <p>19 Q. Are all of your complaints about the flyer,</p> <p>20 that she -- were all of the statements that you wanted</p> <p>21 her to retract, that you felt were libelous or</p> <p>22 defamatory, mentioned in your retraction letter?</p> <p>23 A. I'll have to reread it.</p> <p>24 Q. Well, let's go off the record while you do</p> <p>25 that.</p>	<p style="text-align: right;">Page 164</p> <p>1 A. Because I ultimately decided that what he said</p> <p>2 was not as bad as what some of the other defendants</p> <p>3 said, and because he was leaving Austin to do graduate</p> <p>4 school somewhere else.</p> <p>5 Q. Was it because he was a man?</p> <p>6 A. No.</p> <p>7 Q. You sued three women who made statements about</p> <p>8 you, but none of the men; is that right?</p> <p>9 MR. SIBLEY: Objection.</p> <p>10 A. Ross was the only man that we asked to retract,</p> <p>11 but, as I say, his statements were much shorter and much</p> <p>12 less detailed and we felt it would not be as strong a</p> <p>13 case. It has nothing to do with gender.</p> <p>14 Q. (BY MR. PRINGLE, JR.) And then -- okay. Just a</p> <p>15 second here.</p> <p>16 You made a retraction demand to Hollie</p> <p>17 Green?</p> <p>18 A. Yes.</p> <p>19 Q. And did she retract?</p> <p>20 A. No.</p> <p>21 Q. What -- mark this as Exhibit No. 11.</p> <p>22 (Exhibit 11 marked)</p> <p>23 Q. (BY MR. PRINGLE, JR.) Is that the response that</p> <p>24 you made?</p> <p>25 MR. SIBLEY: Do you have another copy,</p>
<p style="text-align: right;">Page 163</p> <p>1 MR. SIBLEY: Well, we -- we're not gonna</p> <p>2 go off the record whatever he needs to redo.</p> <p>3 A. I need to be given a fair chance to refresh my</p> <p>4 memory. I -- I have not looked at this document since</p> <p>5 over a year ago.</p> <p>6 Q. (BY MR. PRINGLE, JR.) Okay. Well, then I'll</p> <p>7 withdraw the question.</p> <p>8 A. Okay.</p> <p>9 Q. You have a demand to the Office of VP for Legal</p> <p>10 Affairs. Was there any retraction made there?</p> <p>11 A. They claimed sovereign immunity.</p> <p>12 Q. So, the answer's "no"? No retraction?</p> <p>13 A. Yes.</p> <p>14 Q. Okay. You had sent a retraction letter to a</p> <p>15 fellow named Samuel Joseph Ross?</p> <p>16 A. Yes.</p> <p>17 Q. And who is he?</p> <p>18 A. He was an undergraduate student of the classics</p> <p>19 department, who had very soon after the posting of the</p> <p>20 defendant's flyer, through the online site called</p> <p>21 Sportula, had commented on the matter in -- in ways that</p> <p>22 gave credence to the charges.</p> <p>23 Q. Did you -- did he retract any statements?</p> <p>24 A. No.</p> <p>25 Q. Why didn't you sue him?</p>	<p style="text-align: right;">Page 165</p> <p>1 Ross?</p> <p>2 MR. PRINGLE, JR.: Oh, I'm sorry.</p> <p>3 A. Yes, we've put this up online.</p> <p>4 Q. (BY MR. PRINGLE, JR.) And where did you post</p> <p>5 it?</p> <p>6 A. Well, it has its own website address. It's not</p> <p>7 part of any particular platform. One of my friends did</p> <p>8 send the website address to Sportula as part of their</p> <p>9 Twitter feed. And so far as I know, there were no</p> <p>10 further comments on the matter after that. No further</p> <p>11 comments on Sportula.</p> <p>12 (Exhibit 12 marked)</p> <p>13 Q. (BY MR. PRINGLE, JR.) Exhibit No. 12. This is</p> <p>14 a series of e-mails between you and Avi; is that right?</p> <p>15 A. Yes.</p> <p>16 Q. Who is Bill Dobbs?</p> <p>17 A. He's an attorney in New York City who</p> <p>18 specializes in sex offender issues.</p> <p>19 Q. And what has he represented you on before?</p> <p>20 A. Oh. He's -- he's never been -- he -- he --</p> <p>21 he's never had any attorney/client relationship with me.</p> <p>22 Q. Has he ever had any attorney -- attorney/client</p> <p>23 relationship with the William A. Percy Foundation?</p> <p>24 A. No.</p> <p>25 Q. Let me see here. You say in here on page 3, in</p>

May 25, 2021

166 to 169

<p style="text-align: right;">Page 166</p> <p>1 your e-mail to Avi, November 30th, 2019, that no one has</p> <p>2 requested to look at your personnel file. Is that a</p> <p>3 problem, somebody looking at your personnel file?</p> <p>4 A. Well, you yourself questioned me about material</p> <p>5 in that file, and there are -- there is a form. Our</p> <p>6 department chair put a lot of very negative allegations</p> <p>7 in there, although ultimately the university settled</p> <p>8 with me in a way that was satisfactory.</p> <p>9 Q. And are these communications between you and</p> <p>10 Avi about preparation of your statement, by and large?</p> <p>11 A. Mostly.</p> <p>12 Q. All right. You say here that -- on the -- the</p> <p>13 fourth page, you know, which we were just looking at</p> <p>14 here, e-mail to Avi, November 30th, you say that she is</p> <p>15 too stupid to know about how -- about -- she is too</p> <p>16 stupid to know how to go about filing an Open Records</p> <p>17 request.</p> <p>18 Who are you talking about there?</p> <p>19 A. Vader fille.</p> <p>20 Q. I don't know what that means.</p> <p>21 A. "Fille" is the French word for dog.</p> <p>22 Q. Okay. So, who is -- who is -- who are you</p> <p>23 talking about there?</p> <p>24 A. The defendant.</p> <p>25 Q. You're talking about Sarah Blakemore?</p>	<p style="text-align: right;">Page 168</p> <p>1 A. And to me as well.</p> <p>2 Q. And so what -- but why would you make that</p> <p>3 statement, that you think that my client's too stupid to</p> <p>4 file an Open Re -- Records request? You don't even know</p> <p>5 her, do you?</p> <p>6 A. I thought her flyer --</p> <p>7 Q. And that's the only --</p> <p>8 A. -- was --</p> <p>9 Q. -- way you know her?</p> <p>10 A. -- stupidity.</p> <p>11 Q. That's the only way you know her, right?</p> <p>12 A. That and her confrontation with me when she was</p> <p>13 handing out the flyer.</p> <p>14 Q. Um . . .</p> <p>15 A. And that and the information that people found</p> <p>16 on her social media.</p> <p>17 Q. Then, on page 1, you say -- or, actually, this</p> <p>18 is Avi saying this, I think.</p> <p>19 If framed the right way, this could be</p> <p>20 made to appeal to the LGBTQ crowd, but it's -- it's</p> <p>21 ground that we -- as we know LGBTQers are super nervous</p> <p>22 about.</p> <p>23 What does that mean?</p> <p>24 A. The mainstream gay rights organizations don't</p> <p>25 like talking about adolescent sexuality.</p>
<p style="text-align: right;">Page 167</p> <p>1 A. Yes.</p> <p>2 Q. You think she's too stupid to know how to go</p> <p>3 about filing an Open Records request?</p> <p>4 A. I don't think she's very bright.</p> <p>5 Q. That's not my question.</p> <p>6 Do you think she's too stupid to know</p> <p>7 about going -- to go -- how to go about filing an Open</p> <p>8 Records request?</p> <p>9 A. Well, that's what I said here.</p> <p>10 Q. I know that's what you said there. Is that</p> <p>11 what you think?</p> <p>12 A. Well, I thought it at the time I said it.</p> <p>13 Q. Do you think it now?</p> <p>14 A. I don't know.</p> <p>15 Q. Okay. Why would you go -- why would you say</p> <p>16 that she's too stupid to know about how -- how to file</p> <p>17 an Open Records request?</p> <p>18 A. Well, I have a great deal of experience with</p> <p>19 the Open Records process, and I know that the university</p> <p>20 often resists Open Records requests, and that it can be</p> <p>21 quite expensive to, you know, go to court to make them</p> <p>22 open up records. And, you know, there were various</p> <p>23 things in my file that might be embarrassing to the</p> <p>24 university.</p> <p>25 Q. Or to you?</p>	<p style="text-align: right;">Page 169</p> <p>1 Q. Men don't like talking about pedophilia, do</p> <p>2 they?</p> <p>3 A. No, of course not.</p> <p>4 Q. And they don't like coming to the aid of anyone</p> <p>5 accused of pedophilia, do they?</p> <p>6 A. No, they do not.</p> <p>7 Q. Okay. You asked for funds from your -- from</p> <p>8 your chair endowment to prosecute this lawsuit, didn't</p> <p>9 you?</p> <p>10 A. No, I did not.</p> <p>11 Q. What did you ask them? What was the source of</p> <p>12 funds that you requested to prosecute the lawsuit?</p> <p>13 A. Oh, excuse me. I -- yes, I did.</p> <p>14 Q. Okay. So, now you -- okay.</p> <p>15 So, why did you do that?</p> <p>16 A. Because I considered it a research expense.</p> <p>17 Q. A research expense to fight the lawsuit?</p> <p>18 A. To defend my scholarship against inaccurate</p> <p>19 current relations on it.</p> <p>20 Q. To prosecute the liable lawsuit that you filed,</p> <p>21 you felt, was part of your scholarship?</p> <p>22 A. It was defending my scholarship, and those</p> <p>23 research funds are to promote and aid my scholarship,</p> <p>24 and defending my scholarship does that.</p> <p>25 Q. And what was the response when you requested</p>

May 25, 2021

170 to 173

<p style="text-align: right;">Page 170</p> <p>1 for funds to do that?</p> <p>2 A. The person in the dean's finance office</p> <p>3 referred to it to the dean, and the dean referred to</p> <p>4 doing -- refused to do it, saying that it was against</p> <p>5 the rules. When I later submitted an Open Records</p> <p>6 request to see the rules, there were no rules.</p> <p>7 (Exhibit 13 marked)</p> <p>8 Q. (BY MR. PRINGLE, JR.) Exhibit 13. Well, do you</p> <p>9 have two copies?</p> <p>10 A. Uh-huh.</p> <p>11 Q. Yes. One of them's mine. I'm not sure which</p> <p>12 one it is, but -- I don't know.</p> <p>13 This is a letter that you wrote to Randy</p> <p>14 Diehl back in August, 2009, correct?</p> <p>15 A. Yes.</p> <p>16 Q. And you were proposing a buyout or a -- a</p> <p>17 retirement where you would receive money from the</p> <p>18 university?</p> <p>19 A. Yes, although I fully expected he would refuse</p> <p>20 it, as he did.</p> <p>21 Q. And you told the chair of your department, back</p> <p>22 in 2009, that you didn't feel like you could be hired</p> <p>23 elsewhere due to many false and defamatory rumors that</p> <p>24 it spread throughout the profession, in 2009, true?</p> <p>25 A. Yes, that the rumors that he and his faction</p>	<p style="text-align: right;">Page 172</p> <p>1 A. That was the position at the University of</p> <p>2 Illinois, yes.</p> <p>3 Q. And so your reputation suffered damage for</p> <p>4 which it never recovered in 2009?</p> <p>5 MR. SIBLEY: Objection.</p> <p>6 Q. (BY MR. PRINGLE, JR.) Fair?</p> <p>7 MR. SIBLEY: Objection.</p> <p>8 A. I don't know the answer to that.</p> <p>9 Q. (BY MR. PRINGLE, JR.) Okay. Fair enough.</p> <p>10 (Exhibit 14 marked)</p> <p>11 Q. (BY MR. PRINGLE, JR.) Let's look at Exhibit 14.</p> <p>12 Have you seen this before?</p> <p>13 A. Yes, I have.</p> <p>14 Q. What is it?</p> <p>15 MR. SIBLEY: I believe I have your copies.</p> <p>16 MR. PRINGLE, JR.: Oh. No. No. It's --</p> <p>17 it's all highlighted. I don't know why.</p> <p>18 A. Yes, I have, and -- and I composed a detailed</p> <p>19 refutation -- refutation of it, point by point that is</p> <p>20 online.</p> <p>21 Q. (BY MR. PRINGLE, JR.) But this has a date of</p> <p>22 January 1, 2020. This was online in January of 2020,</p> <p>23 correct?</p> <p>24 A. She -- she took it offline for a while, then</p> <p>25 put it back online. I -- I, you know, find it so</p>
<p style="text-align: right;">Page 171</p> <p>1 were spreading about my being a bad colleague and being</p> <p>2 disruptive.</p> <p>3 Q. So, your reputation was kind of damaged a</p> <p>4 little bit in 2009?</p> <p>5 A. Yes, it was.</p> <p>6 Q. Okay.</p> <p>7 A. And it has since been damaged further.</p> <p>8 Q. Yeah. Just how much and incremental we don't</p> <p>9 know, do we?</p> <p>10 A. It was damaged enough, in 2009, that I judged</p> <p>11 no place else would hire me in a senior appointment.</p> <p>12 Plus, by 2009, I would've been what, 53? And,</p> <p>13 generally, for senior appointments, they like to</p> <p>14 appointment someone who has, at least, another 20 years</p> <p>15 to go.</p> <p>16 Q. When you say that Classics remains a very small</p> <p>17 field in the U.S., that's true?</p> <p>18 A. Yes.</p> <p>19 Q. And before this, you got calls from many major</p> <p>20 universities inviting you to apply for senior positions</p> <p>21 there, right?</p> <p>22 A. Yes.</p> <p>23 Q. And you were told of the rumors which resulted</p> <p>24 in you losing a position that would've doubled your</p> <p>25 salary back in 2009, correct?</p>	<p style="text-align: right;">Page 173</p> <p>1 nauseating, I haven't particularly been following the</p> <p>2 permutations of when it's offline and when it's online.</p> <p>3 Q. It was posted June 28, 2018. You see on page</p> <p>4 10 of 11?</p> <p>5 A. Yes, I see that.</p> <p>6 Q. Is this -- so this, apparently, was on the</p> <p>7 internet from June of 2018, through, at least, the</p> <p>8 publication of the flyer?</p> <p>9 A. Yes.</p> <p>10 Q. Is this some criticism of your scholarship and</p> <p>11 your relationship with pederasty?</p> <p>12 MR. SIBLEY: Objection.</p> <p>13 A. That is one of the things that she attempts to</p> <p>14 make false inferences about. I -- I would say that this</p> <p>15 is itself libelous, but at the time, my attitude was:</p> <p>16 It was better not to dignify it with a response.</p> <p>17 Q. (BY MR. PRINGLE, JR.) So, this publication by</p> <p>18 Rebecca Futo Kennedy -- and by the way, she's a</p> <p>19 classicist in -- at a college in Ohio -- Ohio?</p> <p>20 A. Yes. She's an associate professor at Denison</p> <p>21 University.</p> <p>22 Q. Do you know her?</p> <p>23 A. Not personally.</p> <p>24 Q. So, anyone wanting to read up on Thomas K.</p> <p>25 Hubbard could read the statements by Rebecca Futo</p>

<p style="text-align: right;">Page 174</p> <p>1 Kennedy in this blog post, correct?</p> <p>2 A. Yes, they could; and I regret to this day that</p> <p>3 I did not sue her for liable at the time.</p> <p>4 Q. You never even threatened her, did you?</p> <p>5 A. No.</p> <p>6 Q. So --</p> <p>7 A. I -- I thought that would be beneath me and</p> <p>8 that the best thing is not to dignify it with a</p> <p>9 response, and that was what I was also advised by my</p> <p>10 department chair.</p> <p>11 Q. And so when you had -- did you and -- as -- as</p> <p>12 part of your statement responding to the flyer, did you</p> <p>13 invite students to research you and read up on your</p> <p>14 writings?</p> <p>15 A. Yes, I listed the relevant articles for them.</p> <p>16 Q. Does it surprise you that maybe some of the</p> <p>17 people that you invited to read up on you would've seen</p> <p>18 this --</p> <p>19 A. No, if they be --</p> <p>20 Q. -- Exhibit No. 14?</p> <p>21 A. -- if they were to have googled my name, they'd</p> <p>22 probably find it somewhere.</p> <p>23 Q. And so at least we know that, with respect to</p> <p>24 your good name, it would be somewhat compromised by the</p> <p>25 statements and assertions by Professor Kennedy in her</p>	<p style="text-align: right;">Page 176</p> <p>1 doesn't it?</p> <p>2 MR. SIBLEY: Objection.</p> <p>3 A. I expect intelligent people to carefully</p> <p>4 evaluate sources.</p> <p>5 Q. (BY MR. PRINGLE, JR.) Maybe they did, right?</p> <p>6 A. Anyone who carefully evaluates Futo Kennedy's</p> <p>7 blog would see that she is mainly relying on anonymous</p> <p>8 sources concerning a conference paper that she was not</p> <p>9 present at. She talks about my 2010 article without</p> <p>10 having read it or even been aware of who the publisher</p> <p>11 was, and she talks about a seminar that I taught here</p> <p>12 when she was also not a participant. So, anyone with a</p> <p>13 kind of critical training that we give our students in</p> <p>14 classics would know that this is an unreliable source.</p> <p>15 Q. Certainly, what you -- what she says is, the</p> <p>16 most diligent and precise scholars can manipulate or</p> <p>17 misrepresent evidence to suit personal ends.</p> <p>18 You would agree, that's a -- that's a</p> <p>19 risk, isn't it, that happens?</p> <p>20 A. I think her blog is a prime example of it.</p> <p>21 Q. And, apparently, she thinks your writings are</p> <p>22 the same, doesn't she?</p> <p>23 A. But I seriously doubt she has read most of</p> <p>24 them. She admits she didn't read the 2010 article she</p> <p>25 talks about.</p>
<p style="text-align: right;">Page 175</p> <p>1 2018 blog post, which is up on the internet for all to</p> <p>2 say who google your name?</p> <p>3 A. I believe that the last we checked, she had</p> <p>4 withdrawn it again.</p> <p>5 Q. I'm talking about at the time the publication</p> <p>6 was -- was -- at -- at the time the flyer was published</p> <p>7 and handed out.</p> <p>8 A. So far as I know, it was still on the internet</p> <p>9 at that time.</p> <p>10 Q. And so your invitation for people to google you</p> <p>11 and to read up on you, you wouldn't be surprised that</p> <p>12 you would've -- they would've seen Rebecca Futo</p> <p>13 Kennedy's assertions with respect to you and your,</p> <p>14 quote, scholarship, would you?</p> <p>15 A. I don't believe that I encouraged them to</p> <p>16 google me. I asked them to read my publications and</p> <p>17 judge for themselves.</p> <p>18 Q. And --</p> <p>19 A. My publications, not someone else's</p> <p>20 publications about me.</p> <p>21 Q. Well, you certainly can't be critical of</p> <p>22 somebody wanting to see maybe other information about</p> <p>23 you besides what you suggest.</p> <p>24 MR. SIBLEY: Objection.</p> <p>25 Q. (BY MR. PRINGLE, JR.) That seems normal,</p>	<p style="text-align: right;">Page 177</p> <p>1 Q. She goes on to say that Professor Hubbard has</p> <p>2 been directly associated with NAMBLA, North American Man</p> <p>3 Boy Love Assoc -- Association, and association has</p> <p>4 promoted relationships between adult men and boys.</p> <p>5 So, anybody that wanting to investigate</p> <p>6 Profedder -- Professor Hubbard might see the comments of</p> <p>7 a -- another classicist criticizing Hubbard, wouldn't</p> <p>8 they, including the one I just read?</p> <p>9 A. It's is possible, yes.</p> <p>10 Q. She goes on to describe your efforts to get the</p> <p>11 Rind study published, correct?</p> <p>12 A. Yes.</p> <p>13 Q. That you had to actually pen a letter to the</p> <p>14 American Psychological Association or Psychiatric</p> <p>15 Association, the APA, to persuade them to assist in</p> <p>16 persuading them to publish the study?</p> <p>17 A. That is false.</p> <p>18 Q. Um . . .</p> <p>19 A. I -- I did write the American Philological</p> <p>20 Association.</p> <p>21 Q. Okay. There you go.</p> <p>22 Other than that, it's true?</p> <p>23 A. Yes, and the -- and the APA did, in fact,</p> <p>24 intervene in my case and did write a letter of protest</p> <p>25 to the publisher, and -- and that did affect the</p>

May 25, 2021

178 to 181

<p style="text-align: right;">Page 178</p> <p>1 publisher in -- in terms of relenting and in writing us</p> <p>2 to submit the publication to their Rutledge series.</p> <p>3 Q. Would you agree that a person -- never mind.</p> <p>4 That's fine.</p> <p>5 (Exhibit 15 marked)</p> <p>6 Q. (BY MR. PRINGLE, JR.) You have seen Exhibit No.</p> <p>7 15, Davidson and his response to some type of</p> <p>8 disagreement he had with you and Verstraete?</p> <p>9 A. He was responding to a review of his terrible</p> <p>10 book that Beert wrote, in which Beert referred to an</p> <p>11 earlier review, a very negative review of his book that</p> <p>12 I had written. I mean, the one I wrote was actually</p> <p>13 much longer and more detailed than this one.</p> <p>14 Q. And he says, on the topic of sex with minors,</p> <p>15 he says: Obviously, this is the most important issue</p> <p>16 for Verstraete and Hubbard and the reason why it's so --</p> <p>17 suddenly fallen so far from their favor.</p> <p>18 Is that true?</p> <p>19 A. No.</p> <p>20 Q. It says: Hubbard's own Greek Love Reconsidered</p> <p>21 was published by NAMBLA.</p> <p>22 And in that introduction, you refer to the</p> <p>23 outstanding work of Davidson, correct?</p> <p>24 A. I thought his first book was very good. I -- I</p> <p>25 was very disappointed in the second book, because it was</p>	<p style="text-align: right;">Page 180</p> <p>1 Q. All right.</p> <p>2 A. That --</p> <p>3 THE VIDEOGRAPHER: Fix your mike -- oh,</p> <p>4 sorry. Didn't mean to cut you off.</p> <p>5 A. Yeah, it's I think I got tangled in the cord.</p> <p>6 THE REPORTER: I'm sorry, I can't hear.</p> <p>7 Is someone speaking?</p> <p>8 THE VIDEOGRAPHER: Oh --</p> <p>9 MR. PRINGLE, JR.: No.</p> <p>10 THE VIDEOGRAPHER: -- just letting Ross</p> <p>11 know we lost the microphone.</p> <p>12 THE WITNESS: Did you hear what I said?</p> <p>13 THE REPORTER: Yes, I heard the answer. I</p> <p>14 just -- there was other talking going --</p> <p>15 THE WITNESS: Oh.</p> <p>16 THE REPORTER: -- on.</p> <p>17 THE WITNESS: Yeah. That -- that's the</p> <p>18 camera operator.</p> <p>19 (Exhibit 16 marked)</p> <p>20 Q. (BY MR. PRINGLE, JR.) And here in Exhibit 16,</p> <p>21 is this Dr. Yarrow's blog? Or maybe it's not</p> <p>22 Dr. Yarrow. Maybe it's Professor Yarrow. I don't know.</p> <p>23 A. She's both.</p> <p>24 Yes, this is her blog, once she makes the</p> <p>25 corrections that I thought were property.</p>
<p style="text-align: right;">Page 179</p> <p>1 shoddy scholarship. I believe that the review that I</p> <p>2 wrote is among the documents that we submitted to you in</p> <p>3 response to the subpoena.</p> <p>4 Q. It is.</p> <p>5 Have you had discussions with Liv Yarrow?</p> <p>6 A. (No verbal response.)</p> <p>7 Q. Yarrow?</p> <p>8 A. Yes. I -- I know of her.</p> <p>9 Q. And who is she?</p> <p>10 A. She's a professor at Brooklyn College, who</p> <p>11 specializes in Roman Numismatics.</p> <p>12 Q. And what is your -- the nature of your</p> <p>13 discussion with her?</p> <p>14 A. She wrote a blog in which she accused a number</p> <p>15 of classists of pedophilia, and she did not accuse me of</p> <p>16 that directly, but associated me with the four people</p> <p>17 that she did accuse. And I wrote her a detailed letter</p> <p>18 in which I told her that we public evidence on these</p> <p>19 four people, at least two of whom I know personally.</p> <p>20 Gave no evidence that they were actually guilty of</p> <p>21 pedophilia, in the technical sense of the term.</p> <p>22 Q. Did -- and did you threaten her with a lawsuit?</p> <p>23 A. Not specifically. What I told her was, if she</p> <p>24 did not withdraw or correct the statement, that I would</p> <p>25 discuss it with my attorney.</p>	<p style="text-align: right;">Page 181</p> <p>1 Q. And so, as -- as corrected, do you think</p> <p>2 Dr. Yarrow's blog is accurate?</p> <p>3 A. Well, I'd have to read through this again.</p> <p>4 It's some time since I last saw it.</p> <p>5 Q. I assume that if you made -- if you</p> <p>6 corresponded with Dr. Yarrow and indicated that if she</p> <p>7 didn't change her blog, you were gonna discuss it with</p> <p>8 your lawyer, that you subsequently looked at her blog</p> <p>9 and satisfied yourself that you didn't need to sue her;</p> <p>10 is that fair?</p> <p>11 A. Yes.</p> <p>12 Q. At that time that you reviewed the blog back</p> <p>13 then, did you consider it to be accurate and fair?</p> <p>14 A. I felt that it was no longer unfair enough that</p> <p>15 it was worth pursuing.</p> <p>16 Q. Okay.</p> <p>17 A. I -- I -- I do not want to sue people just for</p> <p>18 the sake of suing people. I only want to sue people</p> <p>19 whom I consider directly responsible for grave harm.</p> <p>20 (Exhibit 17 marked)</p> <p>21 Q. (BY MR. PRINGLE, JR.) All right. Let's talk</p> <p>22 about some of your writing here. Exhibit 17. This is</p> <p>23 from -- this is a writing of what, a book review or?</p> <p>24 A. No, it's the introduction to a publication of</p> <p>25 writings by sex offenders explaining their history, and</p>

May 25, 2021

182 to 185

<p style="text-align: right;">Page 182</p> <p>1 we -- I -- I felt that this publication could be useful</p> <p>2 to social scientists working in the field of sex</p> <p>3 offender therapy and treatment.</p> <p>4 Q. So, one thing you say, on page 2, of this</p> <p>5 Exhibit 17 is -- paragraph that starts another study</p> <p>6 about -- by Chaffin and others?</p> <p>7 A. Yes.</p> <p>8 Q. It says: As some of the contributions of this</p> <p>9 collection reveal a large number of the boys with whom</p> <p>10 these men, convicted sex offenders, had contact grew up</p> <p>11 to be heterosexual. The issue needs to be studied</p> <p>12 further with both qualitative and qual --</p> <p>13 quantitateness methods.</p> <p>14 Did I read that right?</p> <p>15 A. Quantitive and qualitative methods.</p> <p>16 Q. Correct.</p> <p>17 Is that correct?</p> <p>18 A. Yes.</p> <p>19 Q. So, apparently then, the effect of -- of sexual</p> <p>20 relations between adults and heterosexual boys needs to</p> <p>21 be studied; hasn't been yet?</p> <p>22 A. It needs to be further studied, yes. The point</p> <p>23 that I'm making with this statement --</p> <p>24 Q. I'm not asking the point.</p> <p>25 A. Okay.</p>	<p style="text-align: right;">Page 184</p> <p>1 MR. SIBLEY: Objection.</p> <p>2 Q. (BY MR. PRINGLE, JR.) Would you find that to be</p> <p>3 less offensive?</p> <p>4 A. It is true that I do scholarship on a subset of</p> <p>5 minor-attracted persons. It is not true that I do</p> <p>6 scholarship on pedophilia, as the term is properly</p> <p>7 defined. But, I believe, her flyer still would have</p> <p>8 been defamatory because she makes statements like</p> <p>9 "advocate the violent rape of teen boys," which I most</p> <p>10 certainly do not.</p> <p>11 Q. You only advocate for loving consensual</p> <p>12 relations between adult men and young boys, correct?</p> <p>13 MR. SIBLEY: Objection.</p> <p>14 A. I believe "advocate" is also a word that she</p> <p>15 misuses.</p> <p>16 Q. (BY MR. PRINGLE, JR.) I'm not asking you if she</p> <p>17 misused the word. I'm asking you if you advocate for</p> <p>18 that?</p> <p>19 MR. SIBLEY: Objection.</p> <p>20 A. No, I do not.</p> <p>21 Q. (BY MR. PRINGLE, JR.) Okay. And all of the</p> <p>22 articles that we've been talking about, where you pose</p> <p>23 those questions, whether it be a proper learning</p> <p>24 experience, and applicable to Western society, you</p> <p>25 wouldn't consider that any sort of ad -- advocacy, would</p>
<p style="text-align: right;">Page 183</p> <p>1 Q. You go on to say: The more severe punishment</p> <p>2 of gay MAPs.</p> <p>3 What is an MAP?</p> <p>4 A. I define it in the parentheses.</p> <p>5 Q. Oh. Minor-attracted persons. Pedophile,</p> <p>6 right?</p> <p>7 A. Pedophile, as we've explained before, refers</p> <p>8 specifically to children up to age 10 or 11.</p> <p>9 Q. Okay. So, pedophiles and pederasts?</p> <p>10 A. Pedophiles, hebephiles, and ephebophiles; those</p> <p>11 are the three technical terms that are used in the</p> <p>12 fields of psychology, sexology, and psychiatry.</p> <p>13 Q. And where is -- where's pederasts?</p> <p>14 A. Pederast is a term that is mainly used of</p> <p>15 historical civilizations, and it is equivalent to the</p> <p>16 current psychiatric term ephebophile.</p> <p>17 Q. So, certainly, pederasts are a subset of</p> <p>18 minor-attracted persons --</p> <p>19 A. Yes.</p> <p>20 Q. -- correct?</p> <p>21 All right. Would you have considered the</p> <p>22 flyer to have been defamatory if Miss Blakemore had</p> <p>23 referred -- instead of using the word "pedophile" or</p> <p>24 "pederasty," she used the term "minor-attracted</p> <p>25 persons"?</p>	<p style="text-align: right;">Page 185</p> <p>1 you?</p> <p>2 MR. SIBLEY: Objection.</p> <p>3 A. Advocacy means wanting people to do it more,</p> <p>4 and I do not want that because, I believe, in our</p> <p>5 society, the risk of harm to all parties involved is far</p> <p>6 too high.</p> <p>7 Q. (BY MR. PRINGLE, JR.) Doesn't advocacy also</p> <p>8 include pointing out the benefits though?</p> <p>9 MR. SIBLEY: Objection.</p> <p>10 A. As I've -- I -- I've given you my definition of</p> <p>11 advocacy.</p> <p>12 Q. (BY MR. PRINGLE, JR.) I'm asking you a</p> <p>13 different question. Does advocacy also mean pointing</p> <p>14 out the benefits of?</p> <p>15 MR. SIBLEY: Objection.</p> <p>16 A. No, not necessarily.</p> <p>17 Q. (BY MR. PRINGLE, JR.) Not necessarily, but can</p> <p>18 it mean that?</p> <p>19 MR. SIBLEY: Objection.</p> <p>20 A. It is not the way that, I think, most people</p> <p>21 would understand the word.</p> <p>22 Q. (BY MR. PRINGLE, JR.) It's not the way you</p> <p>23 would understand the word? Are you --</p> <p>24 A. No, I said the common person -- most people.</p> <p>25 Q. I mean, clearly, you haven't sinuated a common</p>

<p style="text-align: right;">Page 186</p> <p>1 person about what advocacy is, have you?</p> <p>2 MR. SIBLEY: Objection.</p> <p>3 A. I have taught common persons for over 40 years.</p> <p>4 Q. (BY MR. PRINGLE, JR.) Have you taught --</p> <p>5 A. I think --</p> <p>6 Q. -- have you taught --</p> <p>7 A. -- I have --</p> <p>8 Q. -- them advocacy?</p> <p>9 A. I have taught them in a number of capacities.</p> <p>10 No, I do not teach my students advocacy. Most of my --</p> <p>11 in fact, I would say almost all of my students have no</p> <p>12 idea what my politics is.</p> <p>13 Q. Well, I'm not asking about your politics at</p> <p>14 all. I'm asking --</p> <p>15 A. Someone who teaches advocacy is someone who</p> <p>16 teaches the students that this is a position that the</p> <p>17 professor thinks is right and that they ought to follow.</p> <p>18 Q. All right.</p> <p>19 A. I do not do that.</p> <p>20 Q. And --</p> <p>21 A. I am very careful not to do that.</p> <p>22 Q. Why are you so careful not to do it?</p> <p>23 A. Because I believe it is wrong. There is far</p> <p>24 too much politics that has intruded into American higher</p> <p>25 education --</p>	<p style="text-align: right;">Page 188</p> <p>1 A. And I do not think that it has very many</p> <p>2 benefits now.</p> <p>3 Q. You just question whether or not it has a place</p> <p>4 in modern society?</p> <p>5 MR. SIBLEY: Objection.</p> <p>6 Q. (BY MR. PRINGLE, JR.) We saw that from the</p> <p>7 article that we looked at, didn't we?</p> <p>8 A. No, I don't believe so. What that article</p> <p>9 focused on is whether teenagers -- teenage males</p> <p>10 specifically -- are capable of consent. That's what</p> <p>11 the -- was in the title of the article, it is what is in</p> <p>12 the -- in the title of the whole special issue of them,</p> <p>13 Ross.</p> <p>14 Q. You go on to say here in the article that</p> <p>15 entitled, "Social Garbage," on the last page, it says --</p> <p>16 A. Well, it's the book that's entitled, "Social</p> <p>17 Garbage."</p> <p>18 Q. I'm just reading the top -- the top line of the</p> <p>19 article. Okay?</p> <p>20 A. The title of the article is "Introduction."</p> <p>21 Q. See here on page, VIII?</p> <p>22 A. Yes, that -- that is part of the Introduction.</p> <p>23 Q. Yeah. And at the top of the page, it says,</p> <p>24 "Social Garbage." That's where I'm at. That's the page</p> <p>25 I wanted to direct you to. Okay?</p>
<p style="text-align: right;">Page 187</p> <p>1 Q. So --</p> <p>2 A. -- usually from the left wing.</p> <p>3 Q. So, you disagree that your articles which point</p> <p>4 out the vast benefits and advantages of pederastic</p> <p>5 relations, pointing it out to the reader does not</p> <p>6 constitute -- well, does it constitute pointing out the</p> <p>7 benefits of pederasty?</p> <p>8 MR. SIBLEY: Objection.</p> <p>9 Q. (BY MR. PRINGLE, JR.) Let me start -- that --</p> <p>10 that's a bad question.</p> <p>11 A. I agree.</p> <p>12 Q. Finally we agree on something.</p> <p>13 Do your articles that we've looked at</p> <p>14 earlier, do they tend to point out the benefits and the</p> <p>15 positive results of pederasty?</p> <p>16 MR. SIBLEY: Objection.</p> <p>17 A. They point out that it is not always as harmful</p> <p>18 as is commonly assumed.</p> <p>19 Q. That there are benefits from it?</p> <p>20 MR. SIBLEY: Objection.</p> <p>21 A. Within a specific cultural context in which it</p> <p>22 is accepted, such as Ancient Greece. Yes, I do point</p> <p>23 out the benefits, but the cultural context of modern</p> <p>24 American society is entirely different.</p> <p>25 Q. (BY MR. PRINGLE, JR.) And you --</p>	<p style="text-align: right;">Page 189</p> <p>1 A. Yeah.</p> <p>2 Q. All right.</p> <p>3 A. But that is the title of the book, not of my</p> <p>4 Introduction.</p> <p>5 Q. All right. Whatever.</p> <p>6 It says: When -- wherever one may stand</p> <p>7 in the debate over the harmfulness of adult sexual</p> <p>8 contact with minors.</p> <p>9 You think there's a debate about whether</p> <p>10 sexual contact between adults and minors, there's a</p> <p>11 legitimate debate about that, whether it's bad or not?</p> <p>12 MR. SIBLEY: Objection.</p> <p>13 A. Well, NAMBLA certainly contends that it's, in</p> <p>14 many cases, not. I don't agree with them. I think in</p> <p>15 the vast majority of cases, in today's society, it is</p> <p>16 harmful.</p> <p>17 Q. (BY MR. PRINGLE, JR.) You pop -- pause with a</p> <p>18 question on page 189, in the "Afterward." You asked:</p> <p>19 Did these men -- the men that -- and let's put this in</p> <p>20 context. You've interviewed and -- or maybe you didn't</p> <p>21 interview, but they submitted writings to you, these</p> <p>22 convicted sex offenders, correct?</p> <p>23 A. Yes.</p> <p>24 Q. All right. And you identify them by -- by</p> <p>25 initials: K.J., G.D., et cetera.</p>

<p style="text-align: right;">Page 190</p> <p>1 A. I did not; the editor of the volume did. I am</p> <p>2 not the editor of this small -- I merely agreed to write</p> <p>3 it, and production, and Afterward.</p> <p>4 Q. And -- and -- and in the first introductory</p> <p>5 paragraph, and in your Afterward, can you read your last</p> <p>6 sentence on page 189, the first paragraph?</p> <p>7 A. "Did these men become scoutmasters, camp</p> <p>8 counselors, teachers, or even just friends to gain ready</p> <p>9 access to boys they could groom, as the popular</p> <p>10 narrative alleges, or is it because they were so often</p> <p>11 around horny boys that temptation and opportunity</p> <p>12 arose?"</p> <p>13 Again, I'm asking questions to which I</p> <p>14 don't know the answer, but I think are questions</p> <p>15 scholarship needs to ask.</p> <p>16 Q. You think it's a scholarly question to ask</p> <p>17 whether pedophilia victims are just horny boys that</p> <p>18 tempt adults?</p> <p>19 MR. SIBLEY: Objection.</p> <p>20 A. Again, I believe you're misusing the word</p> <p>21 "pedophilia." I do believe that boys of adolescent age</p> <p>22 are often horny and that some, naive or not very bright</p> <p>23 adults, see an opportunity.</p> <p>24 Q. (BY MR. PRINGLE, JR.) And you think that's a</p> <p>25 valid question, as to whether or not the men who are in</p>	<p style="text-align: right;">Page 192</p> <p>1 volume, an Ivan Greta.</p> <p>2 Q. And you're aware, these are men in prison for</p> <p>3 sex crimes?</p> <p>4 A. Yes.</p> <p>5 Q. And you think they're pretty credible?</p> <p>6 A. I believe that the editor of the volume</p> <p>7 developed a relationship with many of these men in which</p> <p>8 they trusted him as someone who would be nonjudgmental.</p> <p>9 Q. That's not my question.</p> <p>10 Do you think these convicted sex offenders</p> <p>11 in prison for felony sex offense are credible subjects,</p> <p>12 deserving of belief as to the nature and extent of their</p> <p>13 crime for which they're in prison?</p> <p>14 A. Some of them are, because some of them say that</p> <p>15 they generally regret it and recognize that what they</p> <p>16 did was wrong. One of them even said that he was</p> <p>17 offering instructions in how sex offenders operate so</p> <p>18 that parents would be more knowledgeable of how to</p> <p>19 protect their children.</p> <p>20 Q. And the men -- you said: These men tell us</p> <p>21 about their memory of the juvenile experiences, which</p> <p>22 they did not in any way see as abusive, but positive and</p> <p>23 pleasurable.</p> <p>24 A. Some of the narratives did talk about their own</p> <p>25 experience when they were boys. And -- and, yes, some</p>
<p style="text-align: right;">Page 191</p> <p>1 prison for having sex with minors are there because --</p> <p>2 not because they groom the boys, it's because they were</p> <p>3 just around a bunch of horny boys that presented an</p> <p>4 opportunity in temptation to these --</p> <p>5 MR. SIBLEY: Object --</p> <p>6 Q. (BY MR. PRINGLE, JR.) -- to these men?</p> <p>7 MR. SIBLEY: Objection.</p> <p>8 Q. (BY MR. PRINGLE, JR.) That's your que -- that's</p> <p>9 the question. You think there's scholarly analysis?</p> <p>10 MR. SIBLEY: Objection.</p> <p>11 A. It -- it is what the men themselves say in the</p> <p>12 narratives that they sent to the editor of the volume.</p> <p>13 You'd re -- have to read their narratives, you know, to</p> <p>14 see that quite often the sex was very incidental to</p> <p>15 their relationship.</p> <p>16 Q. (BY MR. PRINGLE, JR.) And this is with --</p> <p>17 A. That's what it -- maybe happened once or twice</p> <p>18 and that they weren't even necessarily the ones who</p> <p>19 initiated it.</p> <p>20 Q. And this is based upon your -- the information</p> <p>21 that these gentlemen provided to you?</p> <p>22 A. Yes, I read their narratives.</p> <p>23 Q. All right. And --</p> <p>24 A. But they did not provide the information to me.</p> <p>25 They provided the information to the editor of the</p>	<p style="text-align: right;">Page 193</p> <p>1 of them said that they enjoyed it.</p> <p>2 Q. So, some of these men who are in prison for --</p> <p>3 for sex offenses say: I was sexually abused as a child,</p> <p>4 and I liked it so I'm gonna -- I think it's a good</p> <p>5 thing?</p> <p>6 MR. SIBLEY: Objection.</p> <p>7 A. They did not define it as abuse.</p> <p>8 Q. (BY MR. PRINGLE, JR.) I was sexually active</p> <p>9 with an adult when I was a child, and I found it to be</p> <p>10 pleasurable?</p> <p>11 A. Some of them admit that they were the ones who</p> <p>12 initiated the sex and that the men even resisted it, but</p> <p>13 they kept insisting until finally the adult gave in.</p> <p>14 Q. And this is -- these are the prisoners telling</p> <p>15 you that they're in prison because of these sex</p> <p>16 offenses?</p> <p>17 A. Yes. Okay. It's up to the reader to judge.</p> <p>18 Q. Indeed it is.</p> <p>19 A. -- whether they are credible or not.</p> <p>20 Q. It's up to the reader to judge everything the</p> <p>21 reader reads, isn't it?</p> <p>22 A. Yes, it is.</p> <p>23 Q. The credibility of the author, the quality of</p> <p>24 the scholarship, the viability of the opinions reached,</p> <p>25 the --</p>

<p style="text-align: right;">Page 194</p> <p>1 A. Yes.</p> <p>2 Q. -- viability of the statements, the truth or</p> <p>3 accuracy of what's recorded --</p> <p>4 A. Yes.</p> <p>5 Q. -- it's all up to the reader, isn't it?</p> <p>6 MR. SIBLEY: Objection.</p> <p>7 A. Well, this particular volume is not what I</p> <p>8 would call a scholar paper, but it was intended both for</p> <p>9 sex offenders to understand other sex offenders, and it</p> <p>10 is intended for members of the general public, you know,</p> <p>11 who may be relatives of the sex offenders. As I say,</p> <p>12 one of them wrote saying that he was specifically</p> <p>13 warning parents about how sex offenders operate. And --</p> <p>14 and in -- I mean, the only way you learn about these</p> <p>15 people, and their -- their motives, and their way of</p> <p>16 thinking is to listen to them.</p> <p>17 Q. (BY MR. PRINGLE, JR.) Well, that's not true.</p> <p>18 One of the ways you can learn from these men is by</p> <p>19 having proper learning experiences with them by having</p> <p>20 sex; isn't that right?</p> <p>21 MR. SIBLEY: Objection, form.</p> <p>22 A. It's not the way I could learn anything from</p> <p>23 them.</p> <p>24 Q. (BY MR. PRINGLE, JR.) But someone might?</p> <p>25 MR. SIBLEY: Objection.</p>	<p style="text-align: right;">Page 196</p> <p>1 record at 6:37 {sic}.</p> <p>2 Q. (BY MR. PRINGLE, JR.) Now, Professor, we talked</p> <p>3 about your two speeches -- or participation in the</p> <p>4 NAMBLA conferences about 20 years ago?</p> <p>5 A. I did not give speeches there.</p> <p>6 Q. I know. I said, your participation in the</p> <p>7 conferences. You did that, didn't you?</p> <p>8 MR. SIBLEY: Objection.</p> <p>9 A. I was present at the conferences, and I</p> <p>10 occasionally said something.</p> <p>11 Q. (BY MR. PRINGLE, JR.) How many people were at</p> <p>12 the conference?</p> <p>13 A. Very small number. I would say no more than</p> <p>14 20.</p> <p>15 Q. Did you know most of the people there?</p> <p>16 A. No.</p> <p>17 Q. And I asked you, you've never been a member of</p> <p>18 NAMBLA?</p> <p>19 A. No.</p> <p>20 Q. Never applied for membership?</p> <p>21 A. No. I subscribed to their publications for a</p> <p>22 while, but not a member --</p> <p>23 Q. And --</p> <p>24 A. -- membership or --</p> <p>25 Q. -- when did you --</p>
<p style="text-align: right;">Page 195</p> <p>1 A. It is possible, yes.</p> <p>2 (Exhibit 18 marked)</p> <p>3 Q. (BY MR. PRINGLE, JR.) Okay. Exhibit No. 18 is</p> <p>4 a copy of your claim of discrimination against the</p> <p>5 university, correct?</p> <p>6 A. Yes. This is the original EEOC complaint.</p> <p>7 Q. And it includes an affidavit -- or, actually, a</p> <p>8 declaration, which you signed on December 15, 2020?</p> <p>9 A. What page is that?</p> <p>10 Q. Page 5 of 5, bottom.</p> <p>11 A. Yes.</p> <p>12 Q. That's your signature?</p> <p>13 A. Yes.</p> <p>14 Q. And before you signed this document, you read</p> <p>15 it and agreed to the contents of it as being true and</p> <p>16 accurate, didn't you?</p> <p>17 A. Yes.</p> <p>18 Q. All right. Thank you, sir.</p> <p>19 MR. PRINGLE, JR.: Can you give me five</p> <p>20 minutes, and then I'll be done?</p> <p>21 MR. SIBLEY: Yeah.</p> <p>22 THE VIDEOGRAPHER: Off the record at 6:31</p> <p>23 {sic}.</p> <p>24 (Recess from 6:30 p.m. to 6:36 p.m.)</p> <p>25 THE VIDEOGRAPHER: We're back on the</p>	<p style="text-align: right;">Page 197</p> <p>1 A. -- formal association.</p> <p>2 THE REPORTER: I'm sorry, I can't hear.</p> <p>3 A. I had no membership or formal association with</p> <p>4 them.</p> <p>5 Q. (BY MR. PRINGLE, JR.) What period of time did</p> <p>6 you subscribe to NAMBLA publications?</p> <p>7 A. In the 1990s, after I started teaching my</p> <p>8 course on homosexuality and antiquity.</p> <p>9 Q. Were you subscribing to the publications in</p> <p>10 2000, when you went to the conference?</p> <p>11 A. Yes, probably.</p> <p>12 Q. So, you subscribed to publications for, seven,</p> <p>13 eight, ten years; something like that?</p> <p>14 A. Yes, because I -- I wanted to learn their point</p> <p>15 of view. I wanted to see how they appropriated or</p> <p>16 understood the classical model, and I did learn things</p> <p>17 from them.</p> <p>18 Q. Was -- was Melzer -- Mr. Melzer your</p> <p>19 introduction into the NAMBLA membership, to get to --</p> <p>20 A. No.</p> <p>21 Q. How -- how were you allowed to go to the --</p> <p>22 those two conferences if you weren't a member?</p> <p>23 A. They were advertised in my publications.</p> <p>24 Q. They were -- don't they -- don't they -- don't</p> <p>25 they limit attendance at those conferences to</p>

<p style="text-align: right;">Page 198</p> <p>1 individuals friendly to their views?</p> <p>2 A. No.</p> <p>3 Q. So, I could go to a NAMBLA? I could go to a</p> <p>4 NAMBLA meeting if I wanted to?</p> <p>5 A. My understanding is they no longer hold</p> <p>6 meetings.</p> <p>7 Q. Oh.</p> <p>8 Who is George Willard?</p> <p>9 A. That is the nom de plume of Avi Underwood.</p> <p>10 Q. Ah. Oh.</p> <p>11 A. It's the name that he uses in his American</p> <p>12 publications.</p> <p>13 Q. So, Avi wrote the article in Baltimore Outloud?</p> <p>14 A. Yes.</p> <p>15 Q. And did you review that article before you --</p> <p>16 before he sent it?</p> <p>17 A. I think so.</p> <p>18 Q. Did you endorse it?</p> <p>19 A. Endorse it? I felt it was accurate.</p> <p>20 Q. Did you review it to make sure it was accurate?</p> <p>21 A. I -- yes, I -- I believe that he showed it to</p> <p>22 me pre-publication.</p> <p>23 Q. Did you make any corrections to it? Changes?</p> <p>24 A. I don't remember. I -- I may have told him</p> <p>25 that a couple of things in the initial version were</p>	<p style="text-align: right;">Page 200</p> <p>1 But do you think my client had any</p> <p>2 involvement in organizing that?</p> <p>3 A. She is the one who told the popular women's</p> <p>4 movement that I am advocate of pedophilia, and that my</p> <p>5 seminar on rape had been banned by the university, and</p> <p>6 the other things that that group was claiming.</p> <p>7 Q. That's not my question. My question was, do</p> <p>8 you think my client had any involvement in organizing</p> <p>9 that?</p> <p>10 A. She had an involvement in making it possible.</p> <p>11 Q. Other than publication of the flyer, do you</p> <p>12 have any information that my client was in any way</p> <p>13 involved in that demonstration at your house, other than</p> <p>14 publication of the flyer two weeks before?</p> <p>15 MR. SIBLEY: Objection.</p> <p>16 A. Yes. We have evidence of that in the material</p> <p>17 we have received in discovery. We have evidence of her</p> <p>18 text messages with Patricia, no last name, who said that</p> <p>19 she was the -- the head of that group.</p> <p>20 Q. (BY MR. PRINGLE, JR.) And the text messages</p> <p>21 related to the -- to the protest?</p> <p>22 A. She had ceased contact with them after a</p> <p>23 certain point. So, she was not directly in contact with</p> <p>24 them at the time of the mob action, but she certainly</p> <p>25 was in contact with them before, as evidenced in the</p>
<p style="text-align: right;">Page 199</p> <p>1 inaccurate.</p> <p>2 Q. When you published the -- when you published</p> <p>3 the article in Wallace Press, which is a subset or a --</p> <p>4 a -- a front for the -- for NAMBLA, your test -- your</p> <p>5 sworn testimony is you had no understanding and</p> <p>6 affiliation between NAMBLA and Wallace Hamilton Press?</p> <p>7 A. I was led to believe they were two separate</p> <p>8 entities, but that Wallace Hamilton did work with</p> <p>9 NAMBLA, to the extent of selling some of the print run</p> <p>10 to them.</p> <p>11 Q. So, you were aware of an affiliation between</p> <p>12 Wallace Hamilton Press and NAMBLA when you made your</p> <p>13 publication?</p> <p>14 MR. SIBLEY: Objection.</p> <p>15 A. Depends what you mean by "affiliation."</p> <p>16 Q. (BY MR. PRINGLE, JR.) You're aware of a</p> <p>17 relationship between the two?</p> <p>18 A. I guess you could say that that existed, yes.</p> <p>19 Q. All right. At the time?</p> <p>20 A. Yes.</p> <p>21 Q. Now, one of the -- well, let me ask you about</p> <p>22 this. The incident at your house in early December, you</p> <p>23 remember that?</p> <p>24 A. Yes, certainly. How could I forget?</p> <p>25 Q. I don't know.</p>	<p style="text-align: right;">Page 201</p> <p>1 discovery.</p> <p>2 Q. Sure. Contact's great, but did she have any</p> <p>3 involvement in organizing it, or instructing it, or</p> <p>4 facilitating it other than publication of the flyer?</p> <p>5 MR. SIBLEY: Objection.</p> <p>6 Q. (BY MR. PRINGLE, JR.) That's my question.</p> <p>7 MR. SIBLEY: Objection.</p> <p>8 A. She was talking with the head of it, and she</p> <p>9 knew that this was a violent and disruptive group, as</p> <p>10 she revealed in her communications with Jeff Davis.</p> <p>11 Q. (BY MR. PRINGLE, JR.) And so my question to you</p> <p>12 is, is -- is that all? Anything else?</p> <p>13 A. To the extent that the -- I have access to</p> <p>14 information so far. It's what we've seen under</p> <p>15 discovery.</p> <p>16 Q. And you're not aware of anything else, as we</p> <p>17 sit here today, true?</p> <p>18 A. No. In -- in fact, my initial assumption was</p> <p>19 she had nothing to do with it.</p> <p>20 Q. And you're not aware of anything else, any</p> <p>21 other link between my client and the -- the protest at</p> <p>22 your house other than what you've told me about, that my</p> <p>23 client published the flyer and had some communication</p> <p>24 with a woman named Patricia?</p> <p>25 MR. SIBLEY: Objection.</p>

May 25, 2021

202 to 205

<p style="text-align: right;">Page 202</p> <p>1 A. Communication relaying false charges against me</p> <p>2 that motivated that group. And to that extent, but for</p> <p>3 the defendant's actions, that group would've never heard</p> <p>4 of me.</p> <p>5 Q. (BY MR. PRINGLE, JR.) How do you know that</p> <p>6 group didn't research your writings and reach the same</p> <p>7 conclusion that Miss Blakemore did? How do you know</p> <p>8 that?</p> <p>9 A. I -- I do not know for sure what each member of</p> <p>10 that group did. What I do know is she was in active</p> <p>11 contact with them, as was Hollie Green, and that, you</p> <p>12 know, but for their action, it is my belief that that</p> <p>13 group would've never known about me.</p> <p>14 Q. Sure. And whether or not that -- that group</p> <p>15 did, as Miss Blakemore did, and googled your name and</p> <p>16 found Rebecca Futmoore -- Futo Kennedy's blog post on</p> <p>17 you, highly critical of your scholar -- scholarly</p> <p>18 endeavors, you have no idea, do you?</p> <p>19 MR. SIBLEY: Objection.</p> <p>20 A. I -- I have no way of knowing that, but I doubt</p> <p>21 they would've googled my name but for the actions of the</p> <p>22 defendant.</p> <p>23 Q. (BY MR. PRINGLE, JR.) Why do you think my</p> <p>24 client googled your name?</p> <p>25 A. I don't know that she did. You're revealing</p>	<p style="text-align: right;">Page 204</p> <p>1 list of associated individuals, correct?</p> <p>2 A. As one of four.</p> <p>3 Q. As one of four.</p> <p>4 And that was true when Miss Blakemore made</p> <p>5 the statement that -- that you were involved with</p> <p>6 NAMBLA? That you were listed on that page?</p> <p>7 A. It is true that I was on the Wikipedia page,</p> <p>8 but I was unaware of it. This was the first I heard of</p> <p>9 it.</p> <p>10 Q. All right. You indicated that a lot of the</p> <p>11 information you've gotten about my client is from</p> <p>12 friends and associates? People sympathetic to you?</p> <p>13 MR. SIBLEY: Objection?</p> <p>14 A. From my teaching assistant, Alain Zaramian; and</p> <p>15 from Avi Underwood who writes as American publications</p> <p>16 under the name George Willard.</p> <p>17 THE REPORTER: I can't hear the -- under</p> <p>18 the publication -- un --</p> <p>19 MR. PRINGLE, JR.: Under the name George</p> <p>20 Willard.</p> <p>21 A. His American publications, he uses that name</p> <p>22 because it is -- his Israeli name is -- is so strange</p> <p>23 and foreign sounding.</p> <p>24 Q. (BY MR. PRINGLE, JR.) And what have you done to</p> <p>25 verify the accuracy of what Avi and Alain told you?</p>
<p style="text-align: right;">Page 203</p> <p>1 new information to me.</p> <p>2 Q. Pretty safe assumption, isn't it?</p> <p>3 MR. SIBLEY: Objection.</p> <p>4 A. We'll find out when we depose her.</p> <p>5 Q. (BY MR. PRINGLE, JR.) You sure will. Okay.</p> <p>6 Fair enough.</p> <p>7 How did -- how did you get your name off</p> <p>8 the list of associated individuals of NAMBLA?</p> <p>9 A. I presented the management of Wikipedia with</p> <p>10 refutation, including a public statement that I made at</p> <p>11 a conference, around 2011 or '12, in which I made it</p> <p>12 very clear that I did not agree with their positions,</p> <p>13 but I nevertheless felt they had a right to speak.</p> <p>14 Q. No. My question is, how did you get it off,</p> <p>15 not why did you get it off. You -- you -- you contacted</p> <p>16 someone, and how was it actually modified at -- at your</p> <p>17 request or demand?</p> <p>18 A. My understanding is that Wikipedia has records</p> <p>19 of who it is that adds something to an article, and I</p> <p>20 believe that we found that it was a man from Australia</p> <p>21 who used the code name Crossroads," and that he himself</p> <p>22 said that he was not certain enough about the matter</p> <p>23 that he would resist its removal.</p> <p>24 Q. And so the matter that we're talking about is</p> <p>25 you were listed on the Wikipedia page for NAMBLA as a</p>	<p style="text-align: right;">Page 205</p> <p>1 A. I did look up her father's web page -- the web</p> <p>2 page of his corporation and confirmed that he was,</p> <p>3 indeed, a republican political activist. But for the</p> <p>4 most part, I was relying on their research, because I do</p> <p>5 not use social media. I don't touch it.</p> <p>6 Q. All right. Let's talk a little bit about</p> <p>7 the -- the rally -- I mean the flyer. Okay?</p> <p>8 A. May I see the copy?</p> <p>9 Q. Sure. Let me get my copy here.</p> <p>10 UNIDENTIFIED FEMALE SPEAKER: There's one</p> <p>11 also in the back of your e-mails.</p> <p>12 Q. (BY MR. PRINGLE, JR.) Here it is. Here it is.</p> <p>13 Yeah, the e-mail. All right.</p> <p>14 MR. PRINGLE, JR.: So, Joe, just for your</p> <p>15 edification, we're looking at one of the middle pages in</p> <p>16 Exhibit 3.</p> <p>17 Q. (BY MR. PRINGLE, JR.) Let me see. Dr. Thomas</p> <p>18 K. Hubbard has been advocating for pederasty</p> <p>19 (pedophilia) for as long as he has taught at the</p> <p>20 University of Texas.</p> <p>21 You say that's false, true?</p> <p>22 A. It is a misuse of both the word "advocate" and</p> <p>23 "pedophilia."</p> <p>24 Q. Are you saying it's false?</p> <p>25 A. Yes.</p>

May 25, 2021

206 to 209

<p style="text-align: right;">Page 206</p> <p>1 Q. Okay. You would -- would you disagree with the</p> <p>2 statement: Dr. Thomas K. Hubbard has been touting the</p> <p>3 benefits of pederasty for as long as he has taught at</p> <p>4 the University of Texas?</p> <p>5 THE REPORTER: Touting the benefits of</p> <p>6 what? I'm sorry, you're reading so fast.</p> <p>7 Q. (BY MR. PRINGLE, JR.) Would you agree that --</p> <p>8 with the statement: Don -- Dr. Thomas K. Hubbard has</p> <p>9 been touting the benefits of pederasty for as long as he</p> <p>10 has taught at the University of Texas?</p> <p>11 A. Excuse me. I don't see that statement here.</p> <p>12 Q. I know. That's all -- I'm asking you if you</p> <p>13 would agree with that?</p> <p>14 A. No.</p> <p>15 Q. Would you agree with the statement: Dr. Thomas</p> <p>16 K. Hubbard has been touting the benefits of pederasty</p> <p>17 during his time at the University of Texas?</p> <p>18 A. Not the benefits of pederasty in the modern</p> <p>19 world, but I have discussed it mostly in relation to</p> <p>20 Ancient Greece, which was a culture in which it was</p> <p>21 normalized.</p> <p>22 Q. Would you then agree with the statement</p> <p>23 Dr. Thomas K. Hubbard has been touting the benefits of</p> <p>24 pederasty and Ancient Greece during his time at the</p> <p>25 University of Texas?</p>	<p style="text-align: right;">Page 208</p> <p>1 know, can recognize the attraction, but believe that</p> <p>2 it -- it is, simply, has too much risk of harm to put it</p> <p>3 into practice. I mean, there are many organizations now</p> <p>4 that, you know, do serve that community, but equally</p> <p>5 discourage people from actually acting upon their</p> <p>6 attractions.</p> <p>7 Q. Would you agree that Dr. Hubbard, you, have</p> <p>8 used your per -- your position to publish articles in</p> <p>9 NAMBLA publications?</p> <p>10 A. I don't necessarily know, as my position at the</p> <p>11 University of Texas, was why they asked me to that --</p> <p>12 that bar. I -- I think the reason was simply that I was</p> <p>13 knowledgeable of Ancient Greece, and they were</p> <p>14 interested in learning more about it.</p> <p>15 Q. And that was for the North American Man Boy</p> <p>16 Love Association, true?</p> <p>17 A. Yes.</p> <p>18 Q. All right. And in his academic writing,</p> <p>19 Hubbard describes physical relationships between men and</p> <p>20 young boys as proper learning experiences, end quote.</p> <p>21 And that's quoted correctly, isn't it,</p> <p>22 proper learning experiences?</p> <p>23 A. Those three words are, but they're taken out of</p> <p>24 context.</p> <p>25 Q. So you say.</p>
<p style="text-align: right;">Page 207</p> <p>1 MR. SIBLEY: Objection.</p> <p>2 A. I -- I have explained what the Ancient Greeks</p> <p>3 themselves thought about it.</p> <p>4 Q. (BY MR. PRINGLE, JR.) Okay. The next sentence</p> <p>5 is: Since 2000, Dr. Hubbard has used his position to</p> <p>6 further community of individuals hoping to pray on</p> <p>7 underage boys.</p> <p>8 Would you agree with me that NAMBLA --</p> <p>9 NAMBLA members is a community of individuals hoping to</p> <p>10 pray on underage boys?</p> <p>11 MR. SIBLEY: Objection.</p> <p>12 A. No.</p> <p>13 Q. (BY MR. PRINGLE, JR.) Okay. So, the National</p> <p>14 Association of Man -- the Nash -- North American Man Boy</p> <p>15 Love Association does not a community of individuals</p> <p>16 hoping to pray on underage boys, is it?</p> <p>17 A. Judging from the publications that I have seen,</p> <p>18 they warn their members against any legal violation.</p> <p>19 Q. But aren't -- if you're a member of NAMBLA,</p> <p>20 aren't you an individual treated -- pre -- aren't you an</p> <p>21 individual with a tendency to be attracted to underage</p> <p>22 boys?</p> <p>23 A. I think that is probably true of most of them,</p> <p>24 but I also believe that very many of them, including</p> <p>25 Peter Melzer, are completely celibate, and -- and, you</p>	<p style="text-align: right;">Page 209</p> <p>1 And then refers to works, like boys</p> <p>2 sexuality and age of consent encourage these elix --</p> <p>3 illicit acts.</p> <p>4 That's the actual article where that quote</p> <p>5 comes from, isn't it?</p> <p>6 A. That -- that's part of the title.</p> <p>7 Q. Okay.</p> <p>8 A. But I do not agree that the article encourages</p> <p>9 illicit acts.</p> <p>10 Q. Well, you actually don't even agree that your</p> <p>11 writing describes physical relationships between men and</p> <p>12 young boys as proper learning experiences, do you?</p> <p>13 A. As long as we define "proper" in the sense in</p> <p>14 which I used it, which is OED, III.</p> <p>15 Q. Okay. So, you think that physical</p> <p>16 relationships between men and young boys are learning</p> <p>17 experiences that are proper?</p> <p>18 A. Experiences that -- no. We need to go back to</p> <p>19 the context of that, that sentence. Can -- can we look</p> <p>20 at the article again?</p> <p>21 Q. We don't need to.</p> <p>22 It says your -- his course, Mythology of</p> <p>23 Rape, was banned at -- at UT after only one semester.</p> <p>24 We haven't talked much about that course,</p> <p>25 but you did teach that course one semester?</p>

May 25, 2021

210 to 213

<p style="text-align: right;">Page 210</p> <p>1 A. Yes.</p> <p>2 Q. And it was not offered again?</p> <p>3 A. Yes; and we have submitted, in response to your</p> <p>4 subpoena, evidence that there was a plan to offer it</p> <p>5 again, but ultimately both I and the department decided</p> <p>6 that it would be better to teach something else?</p> <p>7 Q. What is --</p> <p>8 A. I -- I was not happy with the student responses</p> <p>9 to the course and decided it -- it would be better not</p> <p>10 to teach it again.</p> <p>11 Q. What is WGS? Is that Women Studies?</p> <p>12 A. Womens and Gender Studies.</p> <p>13 Q. Okay. And Women and Gender Studies did not</p> <p>14 cross list this course?</p> <p>15 A. Not the first time, but they did agree to do it</p> <p>16 the second time.</p> <p>17 Q. Of course, you had communications with the</p> <p>18 people at Women's and Gender Studies about their</p> <p>19 decision, initially, not to list the course, correct?</p> <p>20 A. It was never explained to me why they did not</p> <p>21 list it initially, but what I think I have since learned</p> <p>22 is that they generally want a course to be taught, at</p> <p>23 least, once before they agree to cross list the course.</p> <p>24 So, what happened in this case was not particularly</p> <p>25 exceptional.</p>	<p style="text-align: right;">Page 212</p> <p>1 a -- that this was a topic that might be too traumatic</p> <p>2 to one of their -- to their -- their students, and,</p> <p>3 ultimately, I think they were probably right, yes.</p> <p>4 Q. And one of the reasons that it -- it wasn't</p> <p>5 listed -- or wasn't offered is because nobody signed up</p> <p>6 for it? Very few people signed up for it?</p> <p>7 A. The first time I taught it, it was about 13</p> <p>8 students, and that's a fairly small enrollment for an</p> <p>9 undergraduate class.</p> <p>10 Q. So, on August 1 of 2016, it says: Sue is very</p> <p>11 doubtful that there'd be as many five WGS students who</p> <p>12 would take the course, so I don't think it would make it</p> <p>13 anyway.</p> <p>14 Just wasn't the --</p> <p>15 A. I -- I --</p> <p>16 Q. -- enrollment?</p> <p>17 A. Oh, yes. I -- I think that was part of the</p> <p>18 reason ultimately.</p> <p>19 Q. Okay. And did -- did Dr. Kennedy, in her blog,</p> <p>20 indicate that the cast was -- the course was banned</p> <p>21 after one semester?</p> <p>22 A. I -- I do not recall. I would have to reread</p> <p>23 the appropriate section. If you can refer me to the</p> <p>24 page number, we can examine it.</p> <p>25 Q. Okay. You don't -- as we sit here, you don't</p>
<p style="text-align: right;">Page 211</p> <p>1 Q. And you complained to -- to the dean that the</p> <p>2 reasons WGS gave you for not processing the course were</p> <p>3 be -- mere pretexts?</p> <p>4 A. I don't recall doing that.</p> <p>5 Q. Okay. Do -- do you think that the reasons that</p> <p>6 they gave for not listing the course were pretext</p> <p>7 pre-textual?</p> <p>8 A. But they didn't give reasons. I've already</p> <p>9 said that.</p> <p>10 (Exhibit 19 marked)</p> <p>11 Q. (BY MR. PRINGLE, JR.) No. 19. The last page --</p> <p>12 should be next to last page. You're writing Ms. Sue,</p> <p>13 and you say: One of the pretexts for refusing to</p> <p>14 cross-list the course was that Brown Miller was out of</p> <p>15 date. Another pretext was that Voices Against Violence</p> <p>16 was not invoked in the course description. The third</p> <p>17 pretext was my course description failed to address the</p> <p>18 contemporary rape elimination.</p> <p>19 THE REPORTER: I'm sorry --</p> <p>20 Q. (BY MR. PRINGLE, JR.) What are these pretexts?</p> <p>21 What are these pretexts for? What do you think was the</p> <p>22 real reason they weren't listing your course?</p> <p>23 A. There have been resistance to the course with</p> <p>24 planned to, which is the honors program at the</p> <p>25 university, because they just felt that this was not</p>	<p style="text-align: right;">Page 213</p> <p>1 know?</p> <p>2 A. I -- I do not recall. I mean, I do not</p> <p>3 constantly read the -- that blog, because I find it so</p> <p>4 unpleasant and untrue.</p> <p>5 Q. It says: Furthermore -- I'm back to the --</p> <p>6 yeah. Furthermore, Hubbard is heavily associated with</p> <p>7 the North American Man Boy Love Association, NAMBLA,</p> <p>8 formally the world's largest pedophile activist group.</p> <p>9 A. Okay. Are you on Exhibit 19?</p> <p>10 Q. No. I'm on Exhibit 3.</p> <p>11 A. Oh. We're back to that. We're --</p> <p>12 Q. Yeah.</p> <p>13 A. -- back to the flyer?</p> <p>14 Q. Uh-huh.</p> <p>15 A. I believe that "heavily associated" is wrong.</p> <p>16 Q. Unless -- is that a matter opinion, is whether</p> <p>17 your association is heavy or light, 'cause you were</p> <p>18 associated, weren't -- weren't you?</p> <p>19 A. Depends what you mean by "associate." If</p> <p>20 talking to people and teaching people means associating</p> <p>21 with them, then I guess you could say that I am. But,</p> <p>22 does that mean heavily associating with them?</p> <p>23 I mean, I -- I've talked to members of the</p> <p>24 Communist party. I once headed a department chair who</p> <p>25 was a card carrying member. Does that mean I'm heavily</p>

May 25, 2021

214 to 217

<p style="text-align: right;">Page 214</p> <p>1 associated with the Communist party? That's</p> <p>2 McCarthy-ism by definition.</p> <p>3 MR. PRINGLE, JR.: Yeah, well, I'm not</p> <p>4 really asking about that, so objection nonresponsive.</p> <p>5 Q. (BY MR. PRINGLE, JR.) So, when you say:</p> <p>6 Hubbard -- when this says: Heavily -- Hubbard is</p> <p>7 heavily associated with NAMBLA, formerly the world's</p> <p>8 largest pedophile activist group, you take issue with</p> <p>9 the word "heavily."</p> <p>10 MR. SIBLEY: Objection.</p> <p>11 A. I -- I do, and I take exception to the word</p> <p>12 "associated," and I'm not sure I would call it "a</p> <p>13 pedophile activist group." It was more of a</p> <p>14 minor-attracted person support group.</p> <p>15 Q. (BY MR. PRINGLE, JR.) Minor-attractive</p> <p>16 people -- minor-attracted persons being adults attracted</p> <p>17 to underage children, among other things?</p> <p>18 MR. SIBLEY: Objection.</p> <p>19 A. Pedophiles, hebephiles, and ephebophiles.</p> <p>20 Q. (BY MR. PRINGLE, JR.) Okay. So, would you be</p> <p>21 okay with the sentence if it had said: Hubbard was</p> <p>22 published by the North American Man Boy Love Association</p> <p>23 formerly the world's largest group of minor-attracted</p> <p>24 persons? Would that be -- would that be an accurate</p> <p>25 statement?</p>	<p style="text-align: right;">Page 216</p> <p>1 form of coercion or violence.</p> <p>2 Q. You are aware that any sort of sexual contact</p> <p>3 between an adult male and an underage boy, in Texas, is</p> <p>4 a crime of violence? You know that?</p> <p>5 A. No, it's -- no, it's -- I mean, it -- it's --</p> <p>6 Q. Just -- you just --</p> <p>7 A. -- it's a statutory. It is a statutory</p> <p>8 offense. I mean, there's a difference between violent</p> <p>9 rape and statutory rape, that's why we have the terms.</p> <p>10 Q. She doesn't say anything about violent rape,</p> <p>11 does she? She talks about violent crime. You're aware</p> <p>12 that sex between an adult male and a 14-year-old boy, in</p> <p>13 Texas, is a crime of violence. Did you know that?</p> <p>14 MR. SIBLEY: Objection.</p> <p>15 A. It's a felony. Not all felonies are crimes of</p> <p>16 violence.</p> <p>17 Q. (BY MR. PRINGLE, JR.) Do you know whether it's</p> <p>18 a crime of violence or not?</p> <p>19 A. I -- I have read the statute. I do not believe</p> <p>20 that the word "violence" is there on the section of the</p> <p>21 statute that is pertinent to sexual assault against</p> <p>22 underage persons.</p> <p>23 Q. You believe that. You don't know one way or</p> <p>24 the other, do you?</p> <p>25 A. I have read the text of the law. I even taught</p>
<p style="text-align: right;">Page 215</p> <p>1 A. Yes.</p> <p>2 Q. Okay. And the next statement: He is even on</p> <p>3 the list of associated individuals on the NAMBLA</p> <p>4 Wikipedia page.</p> <p>5 That's true top, side, and bottom, isn't</p> <p>6 it?</p> <p>7 A. At the time that she made this statement, it</p> <p>8 was true. But, that statement was itself defamatory.</p> <p>9 Quoting other people's defamatory statements is itself</p> <p>10 defamatory.</p> <p>11 Q. No. She says: He's on the list of associating</p> <p>12 individuals. That's subjectively true. Anybody who</p> <p>13 goes to Wikipedia, they see that you're on the list of</p> <p>14 associated individuals.</p> <p>15 A. But she articulates that sentence within a</p> <p>16 context that suggests that that is evidence of my</p> <p>17 agreeing with their views, which I do not.</p> <p>18 Q. I didn't see that. Where does she say that you</p> <p>19 agree with their views? Point that out to me.</p> <p>20 A. It's the argument of the whole statement, is</p> <p>21 that I'm furthering the community of individuals, by</p> <p>22 which she means NAMBLA, and that I'm heavily associated</p> <p>23 with the group, and, you know, that I advocate the</p> <p>24 violent rape of teen boys. I mean, not even NAMBLA</p> <p>25 advocates that. I mean, they're very much against any</p>	<p style="text-align: right;">Page 217</p> <p>1 it in some of my courses. I do not recall the word</p> <p>2 "violence" being used in their definition of statutory</p> <p>3 sexual assault. The word "assault" is used. The word</p> <p>4 "felony" is used. I do not recall the word "violence"</p> <p>5 being used. Maybe it is, but you'd have to show me the</p> <p>6 text to me.</p> <p>7 Q. Well, would you agree that any sort of</p> <p>8 nonconsensual sex between an adult and a minor is a</p> <p>9 crime of violence?</p> <p>10 A. It may be a crime of manipulation.</p> <p>11 Q. That's not my question though.</p> <p>12 Is it a crime of violence? If you don't</p> <p>13 know, tell me you don't know.</p> <p>14 A. Violence implies the use of force. Do all</p> <p>15 contacts involve the use of force? No.</p> <p>16 Q. So, you don't have a position as to whether or</p> <p>17 not nonconsensual sex between an adult male and a child</p> <p>18 is a crime of violence?</p> <p>19 MR. SIBLEY: Objection. Objection.</p> <p>20 A. It -- it depends on how you define</p> <p>21 "nonconsensual" and how you define "violence."</p> <p>22 Q. (BY MR. PRINGLE, JR.) I'm talking about</p> <p>23 nonconsensual as being the fact that the child was not</p> <p>24 old enough to give consent.</p> <p>25 A. That's a canard.</p>

May 25, 2021

218 to 221

<p style="text-align: right;">Page 218</p> <p>1 Q. Uh-huh.</p> <p>2 A. I call that a canard and a legal fiction,</p> <p>3 because what the historical, anthropological,</p> <p>4 psychological evidence and the -- the statements of many</p> <p>5 people who as adolescent males have sexual experience</p> <p>6 with elders shows that -- that they -- they were quite</p> <p>7 conscious of what was going on, and, you know, quite</p> <p>8 capable of asserting the consent or not consent.</p> <p>9 Q. Is it --</p> <p>10 MR. SIBLEY: What time do we have?</p> <p>11 THE VIDEOGRAPHER: Seven hours and ten</p> <p>12 minutes.</p> <p>13 MR. SIBLEY: Oh. Yeah. We gotta -- you</p> <p>14 need to close it up and go.</p> <p>15 Q. (BY MR. PRINGLE, JR.) We refuse to stand by</p> <p>16 while this man uses his status to promote pedophilia.</p> <p>17 And your position is you have never</p> <p>18 promoted pedophilia, correct?</p> <p>19 A. My scholarship does not even concern</p> <p>20 pedophilia. It concerns ephebophilia or pederasty, and</p> <p>21 I don't promote it; I examine it.</p> <p>22 Q. And -- and we've -- and we pointed out that a</p> <p>23 lot of your scholarship analyzes the many benefits of</p> <p>24 sexual conduct between adults and minor children, true?</p> <p>25 MR. SIBLEY: Objection.</p>	<p style="text-align: right;">Page 220</p> <p>1 Athens during its whole history, but during a certain</p> <p>2 period of the late Fifth Century when Athens was a</p> <p>3 radical democracy and when there was an acute manpower</p> <p>4 shortage due to, you know, plague and war. And the age</p> <p>5 of marriage was reduced from the 30s to the early 20s or</p> <p>6 even late teens, it became progressively less respected.</p> <p>7 And, I mean, that's -- that's one of the, really,</p> <p>8 original things I think I contribute to the debate.</p> <p>9 Q. All right. I appreciate your time today,</p> <p>10 Doctor.</p> <p>11 A. Okay. Well, I'm glad it's over.</p> <p>12 MR. SIBLEY: Pass the witness?</p> <p>13 MR. PRINGLE, JR.: Yeah.</p> <p>14 MR. SIBLEY: All right. Reserve questions</p> <p>15 till time of trial.</p> <p>16 THE VIDEOGRAPHER: Off the record at 7:10</p> <p>17 {sic}.</p> <p>18 THE REPORTER: Okay. And signature?</p> <p>19 MR. SIBLEY: Yes.</p> <p>20 THE REPORTER: Read and sign?</p> <p>21 MR. SIBLEY: Yes.</p> <p>22 THE REPORTER: Okay. And did you want --</p> <p>23 oh. Wait just a minute. Wait just a minute, please.</p> <p>24 Did you want to purchase a copy of the transcript, sir?</p> <p>25 MR. SIBLEY: Yes.</p>
<p style="text-align: right;">Page 219</p> <p>1 A. The benefits within a society like Ancient</p> <p>2 Greece as viewed by the Greeks.</p> <p>3 Q. (BY MR. PRINGLE, JR.) Okay.</p> <p>4 A. Not necessarily as viewed by me. And I have</p> <p>5 repeatedly said that, I think, in contemporary American</p> <p>6 society, it really does not have a place, but I have</p> <p>7 also said it is not as harmful as many people assume.</p> <p>8 And the recidivism rates show that we do not need to</p> <p>9 imprison people for decades.</p> <p>10 Q. If it doesn't have a place in today's society</p> <p>11 and it was rejected in Athenian society, why do you</p> <p>12 write so much about it?</p> <p>13 A. Well, it was not always.</p> <p>14 THE REPORTER: I'm sorry, someone's</p> <p>15 hitting the -- the computer or something and I can't</p> <p>16 hear.</p> <p>17 Why do you -- why do you write -- what was</p> <p>18 that?</p> <p>19 Q. (BY MR. PRINGLE, JR.) Why do you write so much</p> <p>20 about it?</p> <p>21 A. Because it is a phenomenon of great interest in</p> <p>22 scholarship. There's been a lot of work done on it over</p> <p>23 the last four decades, and I concluded that a lot of</p> <p>24 this work was flawed and incorrect and anachronistic.</p> <p>25 And, no, it was not rejected by Athenian poli -- like</p>	<p style="text-align: right;">Page 221</p> <p>1 THE REPORTER: Okay.</p> <p>2 (Proceedings concluded at 7:09 p.m.)</p> <p>3</p> <p>4</p> <p>5</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>


May 25, 2021

222 to 225

<p style="text-align: right;">Page 222</p> <p>1 CHANGES AND SIGNATURE</p> <p>2 WITNESS NAME : Thomas Hubbard, Ph.D.</p> <p>3 DATE OF DEPOSITION: May 25, 2021</p> <p>4</p> <p>5 PAGE LINE CHANGE REASON</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 224</p> <p>1 UNITED STATES DISTRICT COURT FOR THE</p> <p>2 WESTERN DISTRICT OF TEXAS</p> <p>3 AUSTIN DIVISION</p> <p>4 DR. THOMAS HUBBARD, Ph.D.)</p> <p>5 Plaintiff,)</p> <p>6 v.) CA NO. 1:20-cv-00767-RP</p> <p>7)</p> <p>8 SARAH ALLEN BLAKEMORE; and) JURY DEMANDED</p> <p>9 JOHN DOES 1 - 10,)</p> <p>10 Defendants)</p> <p>11</p> <p>12 REPORTER'S CERTIFICATE</p> <p>13 ORAL VIDEOTAPED DEPOSITION OF</p> <p>14 THOMAS HUBBARD, Ph.D.</p> <p>15 May 25, 2021</p> <p>16 VOLUME 2</p> <p>17 (Reported Remotely)</p> <p>18</p> <p>19 I, Jennifer L. Marquardt, the undersigned Certified</p> <p>20 Shorthand Reporter in and for the State of Texas (via</p> <p>21 Zoom) do hereby certify to the following:</p> <p>22 That I relieved a court reporter from the morning</p> <p>23 session of Thomas Hubbard's deposition;</p> <p>24 That the witness, Thomas Hubbard, Ph.D., (via Zoom),</p> <p>25 was duly sworn by the court reporter and that the</p> <p>transcript of the oral deposition is a true record of</p> <p>the testimony given by the witness;</p> <p>I further certify that pursuant of FRCP Rule</p>
<p style="text-align: right;">Page 223</p> <p>1</p> <p>2</p> <p>3</p> <p>4</p> <p>5</p> <p>6</p> <p>7</p> <p>8 I declare under penalty of perjury that the</p> <p>9 foregoing is true and correct.</p> <p>10</p> <p>11</p> <p>12 THOMAS HUBBARD, Ph.D.</p> <p>13</p> <p>14</p> <p>15 SUBSCRIBED AND SWORN TO BEFORE ME, the undersigned</p> <p>16 authority, by the witness, THOMAS HUBBARD, Ph.D., on</p> <p>17 this the ____ day of _____, ____.</p> <p>18</p> <p>19</p> <p>20 NOTARY PUBLIC IN AND FOR</p> <p>21 THE STATE OF _____</p> <p>22</p> <p>23 My Commission Expires: _____</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 225</p> <p>1 30(e)(1) that the signature of the deponent:</p> <p>2 XX was requested by the deponent or a party</p> <p>3 before the completion of the deposition and is to be</p> <p>4 returned within 30 days from the date of receipt of the</p> <p>5 transcript. If returned, the attached Changes and</p> <p>6 Signature page contains any changes and the reasons</p> <p>7 therefor;</p> <p>8 ____ was not requested and/or was waived by the</p> <p>9 deponent or any party present and/or via Zoom before the</p> <p>10 completion of the deposition;</p> <p>11 That pursuant to information given to the deposition</p> <p>12 officer at the time said testimony was taken, the</p> <p>13 following includes all parties of record and the amount</p> <p>14 of time used by each party at the time of the</p> <p>15 deposition:</p> <p>16 JOSEPH D. SIBLEY : (00Hr:00m) (via Zoom)</p> <p>17 Attorney for the Plaintiff, Thomas Hubbard,</p> <p>18 Ph.D.</p> <p>19 BRANTLEY ROSS PRINGLE, JR.: (05Hr:00m) (via Zoom)</p> <p>20 Attorney for the Defendant, Sarah Allen</p> <p>21 Blakemore</p> <p>22 That \$_____ is the deposition officer's charges</p> <p>23 to the Defendant, Sarah Allen Blakemore; Brantley Ross</p> <p>24 Pringle, Jr., Wright & Greenhill, P.C.: 900 Congress</p> <p>25 Avenue, Suite 500, Austin, Texas 78701 for preparing the</p> <p>original deposition and any copies of exhibits.</p> <p>I further certify that I am neither attorney or</p>

May 25, 2021

226

<div>Page 226</div> <div>1 counsel for, related to, nor employed by any parties to</div> <div>2 the action in which this testimony is taken and,</div> <div>3 further, that I am not a relative or employee of any</div> <div>4 counsel employed by the parties hereto or financially</div> <div>5 interested in the action.</div> <div>6 SUBSCRIBED AND SWORN TO under my hand and seal of</div> <div>7 office on this the 11th day of June, 2021.</div> <div>8 </div> <div>9</div> <div>10 Jennifer L. Marquardt, CSR</div> <div>11 Texas CSR No. 7034</div> <div>12 Expiration: 04/30/2022</div> <div>13 U.S. LEGAL SUPPORT</div> <div>14 Firm's Registration No. 122</div> <div>15 16825 Northchase Drive, Suite 900</div> <div>16 Houston, Texas 77060</div> <div>17 Telephone: (713)653-7100</div> <div>18 Facsimile: (361)888-6550</div> <div>19</div> <div>20</div> <div>21</div> <div>22</div> <div>23</div> <div>24</div> <div>25</div>	

May 25, 2021

1

	1200	143	111:13 118:4
(2:10	143:16	135:22
	128	144	139:12
(2007)	97:23	148:2	148:22
3:15	12:25	145	195:2,3
	43:17,24,25	151:15	180
0	44:1	15	4:9
	13	32:4 58:1	181
015	4:3 82:4	117:15,25	4:10
58:24	138:5 170:7,	118:20	1880s
	8 212:7	140:6,15	139:13
	130	141:13	189
1	103:21	178:5,7	189:18 190:6
	132	195:8	19
1	108:16	155	211:10,11
1:6 25:5	134	3:18	213:9
45:15 168:17	115:1	159	1930s
172:22	135	3:20	78:10
212:10	121:25	16	195
1.7	136	4:3,9 117:25	4:11
27:15	132:15	121:10	1970s
10	138	139:12	81:4 83:9
1:6 58:1	138:15	140:11,21	122:25
86:13 89:17	139	180:19,20	1980s
139:11	139:1	16-year-old	52:2 80:7
162:15 173:4	14	98:11	93:10
183:8	97:10 114:10	162	1990s
101	117:15	3:21	52:2 55:13
40:25	118:20	164	61:9 67:16
10:21	140:6,15	3:22	80:7 197:7
41:24	141:8,13,16	165	1998
11	144:1	3:24	97:2
164:21,22	157:15,16	16825	19th
173:4 183:8	172:10,11	5:7	77:5,11 91:6
110263	174:20	17	1:20-cv-
2:5	14-year-old	4:10 111:14	00767-rp
1108	47:5 71:18	118:4 148:22	1:4
2:5	72:11,16,22	181:20,22	1:37
118	74:19 75:19	182:5	1:21 5:2
76:16	82:7 114:9	170	
11:00	115:7 118:7,	4:3	
6:22	13 130:25	172	
12	143:10 144:9	4:4	
3:24 101:14	149:21	178	
138:5 139:12	216:12	4:5	
165:12,13	141	18	
203:11	141:20	107:12	
			2
			2
			1:14 3:3
			44:19 45:16
			58:22 67:4,
			10 182:4

2-to-300	2021	213:10	5:44
63:25	1:13,20	30	160:6,8
20	20s	24:9	
52:21 55:15,	151:12 220:5	30s	<hr/> 6 <hr/>
23 57:15	20th	97:19 220:5	
59:23 64:18	67:20 77:6,	30th	6
65:22 70:12	12 91:7	166:1,14	3:15 25:13
171:14	21	3:08	29:4,6
196:4,14	6:9,12 97:10	61:22,25	63:15,17,21,
20-odd	211		23 67:1
59:19	4:12	<hr/> 4 <hr/>	60
2000	21st		75:11
62:19 197:10	6:1 35:7	4	600-page
207:5	222	3:12 24:25	110:21
2001	3:5	25:2,10,12	60s
55:13 101:7	224	29:5 32:16	83:9
132:22	3:6	35:12 36:13	61
2002	22nd	76:22	3:13
133:10,11	25:7,9	4-feet	63
2009	23	140:25	3:15
4:3 156:11	3:11 24:9	40	6:30
170:14,22,24	24	14:7 186:3	195:24
171:4,10,12,	3:12 39:10	40-odd	6:31
25 172:4	41:24	8:10	195:22
2010	25		6:36
96:15,17	1:13,20	<hr/> 5 <hr/>	195:24
156:10	43:17 44:1		6:37
176:9,24	72:21	5	196:1
2011	25th	3:5,13 25:13	6:57
203:11	43:22	29:4,6 61:23	25:7
2013	28	62:7,16	
58:12	173:3	77:17 195:10	<hr/> 7 <hr/>
2015	29	500	
58:16	29:10	1:19	7
2016	2:28	503	96:10
212:10	24:9	3:15	7034
2017	2:55	5051	5:4
27:13	61:21,22	2:10	70s
2018		53	81:8
173:3,7		171:12	713 583-1131
175:1	<hr/> 3 <hr/>	5:00	2:6
2019	3	155:24	713 966-6789
6:1 24:9	3:11 23:10,	5:31	2:6
29:10 39:10	12 35:12	160:6	713 977-5395
43:17 166:1	45:19 146:2	5:32	2:11
2020	165:25	160:4	
172:22 195:8	205:16		

713 977-8686 2:11	ability 36:5	accuracy 74:12 194:3	actresses 137:17
740 3:15	able 40:18 115:5	204:25	acts 209:3,9
77 101:11 102:3,5	139:25 above 101:12 102:11	accurate 99:11 181:2, 13 195:16 198:19,20 214:24	actual 53:9 81:17 209:4
77056 2:10	above-styled 1:20	accuse 179:15,17	acute 220:3
77060 5:8	absolutely 22:19 34:22 130:13	accused 54:6,8,10, 12,20 81:3 169:5 179:14	ad 184:25
78701 1:19 2:5	abuse 80:2,9,12,15 81:14,15,18, 20,21 82:2,9 93:10 152:5 193:7	acknowledged 13:8 90:23 92:11	add 145:18 155:2
7:09 1:21	abused 193:3	acquainted 76:15	added 65:14
7:10 220:16	abusive 82:14 103:3, 4 107:22 152:4 192:22	acquire 121:1	adding 145:5
<hr/>	academic 6:9,12 75:13 79:25 134:18 208:18	acquired 46:1,10	addition 81:4 95:1 112:19
8 <hr/>	Academy 134:22	act 95:11 97:16	additive 63:13
8 84:25 139:1 155:21,23 156:2,8	accept 33:19 87:7	acting 208:5	address 10:6 63:10 165:6,8 211:17
80s 56:14 80:24	accepted 187:22	action 30:13 200:24 202:12	addressed 43:23,24
<hr/>	access 60:19 71:4 190:9 201:13	actions 202:3,21	addressing 10:11
9 159:21,22	accessing 75:25	active 73:7 193:8 202:10	adds 203:19
900 1:19 5:8	accidents 141:2	activist 159:8 205:3 213:8 214:8, 13	adept 143:23 144:3
90s 60:13	accordance 1:23	activists 36:16,22 37:4 38:23 90:24 91:17 92:12	adjective 145:7,18 146:4 147:24
96 3:16 156:15	accounts 80:11	activity 125:8,9,13 140:19	adjustment 142:20
98 158:3			administering 5:4
<hr/>			administrativ e 64:21
A <hr/>			admiration 153:12
abandon 113:2			
abhor 22:19			

admired	21 73:23	190:18,23	advocates
126:15,23	74:20 75:15	214:16	215:25
127:19	76:3 79:16,	218:24	advocating
128:9,12	18 80:22	advance	13:2,7 91:14
129:7	82:9 91:19	32:10 46:8	158:10
admit	93:15 95:16	advanced	159:10,12
193:11	101:20	69:17	205:18
admits	102:19	109:13,21	affairs
176:24	103:1,2,10	133:7	36:1 70:3
admitted	104:24	advancement	163:10
66:1 80:22	105:25	94:11	affect
adolescent	106:3,9	advantage	45:21 177:25
3:17 58:7	107:11,15	92:16 108:4,	affidavit
73:22 92:3,9	108:9 109:1	9 132:8,10	195:7
96:12 97:17	114:8 115:6	advantages	affiliated
100:16	116:4 121:3,	112:15 187:4	160:20
101:3,12	9 130:15,25	adverb	affiliation
115:11	131:8 135:20	147:16	199:6,11,15
118:20,22	136:4	advertised	Afterward
125:23	137:14,23	197:23	189:18
130:8,16,17	141:25	advice	190:3,5
141:25	142:1,5,17,	31:21	age
142:5,16	19 143:2,15	advise	3:19 18:21
146:21	144:9,18	146:20	45:6 56:1
154:23 155:2	146:8,25	advised	58:6 60:1
158:20	148:7 149:4,	174:9	67:25 73:23
168:25	5 151:7,20	advises	74:24 76:13
190:21 218:5	152:11	104:2	78:21,22
adolescent's	153:18	advo	79:17 82:2
154:22	154:15,18	158:10	83:18 94:2,5
adolescents	157:14,22	advocacy	97:20 98:3
101:10	159:6 177:4	141:23	99:23 100:19
115:13 116:5	184:12 189:7	184:25	101:12
127:10	193:9,13	185:3,7,11,	102:8,11,12,
130:14	216:3,12	13 186:1,8,	19 111:13
136:5,6	217:8,17	10,15	114:6 117:20
143:2 150:14	adults	advocate	118:19
151:9	47:1 55:4	12:18 13:19	119:4,8,10,
adopt	70:2 71:11	60:14,15	19 120:4
69:20	73:7 87:11	119:18	121:10
adoption	104:19 106:6	184:9,11,14,	135:12,13
94:10	127:9 131:24	17 200:4	136:3,11
adult	138:7	205:22	138:5,17,23
13:3 16:2	149:15,25	215:23	139:7,11,17
47:5 69:5,14	150:14	advocated	140:6,11,13,
70:6,23,24	151:10	12:25 81:11	14 141:8,13,
71:5,12,21	158:25		16 142:15
72:4,12,15,	182:20		143:15 144:6
	189:10		

148:18	22 207:8	66:25 68:14	104:15
153:10,21,23	208:7 209:8,	79:25 80:3	111:25
154:5 158:16	10 210:15,23	81:16 124:9	113:11
183:8 190:21	215:19 217:7	134:22	114:2,17
209:2 220:4	agreed	139:12	187:22
age-	20:10 190:2	160:21	206:20,24
discrepant	195:15	177:2,14,19	207:2 208:13
109:14 113:6	agreeing	186:24	219:1
age-equals	215:17	187:24	Anderson
153:4	agreement	198:11	21:19
age-of-	161:21,23	204:15,21	Angelo
consent	162:2	207:14	95:25
82:23	ahead	208:15 213:7	Anita
age-span	8:1 21:9	214:22 219:5	81:4
143:18	63:15 108:21	amount	Ann
agenda	109:7,9,11	101:15	84:5
158:6	130:1	Amsterdam	announced
agentive	aid	156:19	7:4
145:16	35:18 169:4,	anachronistic	annually
ages	23	219:24	100:23
68:18 69:19,	Alain	anal	anonymous
21 81:25	21:20 22:1	79:16 99:23	72:18 176:7
97:9 118:3	204:14,25	117:24 118:5	answer
148:21	Alex	120:17	22:20 34:7
agitated	160:18,20	124:15	59:20 109:18
35:7	allegations	anally	110:9 111:22
ago	36:24 166:6	98:23 99:4,	112:7,9,10,
13:24 55:15,	alleged	5,17 101:19	20,21 115:4,
23 56:7,9	91:15	103:9	24 120:12
57:16 59:19,	alleges	analysis	127:2
23 64:18	190:10	18:23 70:12	128:14,18,24
65:22 68:20	Allen	75:18 76:6	129:15,16,
163:5 196:4	1:5 2:15	191:9	20,21,22,23
agree	allow	analyzed	132:1,2
37:18,22	75:8	67:17 74:18	135:2 136:1,
46:25 47:7	allowed	analyzes	16,21 137:1
48:20 60:2	48:1 129:23	218:23	148:10 150:3
72:14 77:24	197:21	analyzing	155:19,20
78:1 85:6	alternative	71:14 103:13	162:8 172:8
92:13 95:20	83:10,11,15	159:5	180:13
99:12 123:2	112:18	ancestors	190:14
124:19 146:5	ambitious	130:11	answer's
157:8,11	110:5	ancient	163:12
176:18 178:3	amendment	4:7 15:13	answered
187:11,12	33:19	16:1 69:3,8	128:8
189:14	American	84:13,14	answers
203:12	17:18 53:17	87:1 89:12	115:23
206:7,13,15,			

120:14	182:19	approve	134:17
126:18	appeal	111:4 121:6	141:20
128:15,25	32:11 168:20	approximately	145:18
anthropologic	Appearances	130:7 142:21	146:11
al	2:1 3:3	156:10	151:14 158:3
53:8 84:9	appeared	archives	159:5 161:1
111:16 114:3	30:6	101:6 142:12	176:9,24
218:3	appearing	area	188:7,8,11,
anthropology	1:18	27:21	14,19,20
150:25	appears	arguably	198:13,15
anticipated	29:24	89:3	199:3 203:19
65:21	appetites	argued	209:4,8,20
antigay	88:23 90:11	97:13 112:5	articles
47:6	applic	114:21	17:16 134:12
antiquity	150:19	arguing	159:13
197:8	applicable	159:18	174:15
Antonio	108:23	argument	184:22
81:2	109:6,20	47:17 84:18	187:3,13
anus	110:10,18	215:20	208:8
79:14	111:23	arguments	articulate
anybody	112:1,8,11	111:12	120:4
9:17 13:19	113:22	aristocratic	articulated
22:9 41:16	150:20	112:14	88:9 140:15
177:5 215:12	184:24	114:24	articulates
anyone	application	Aristotle	215:15
13:1 39:7	157:2	98:19	artists
49:10 53:11	applied	Aristotle's	77:7
61:1 119:6	157:12	98:17,21	arts
146:20 169:4	196:20	arose	84:7
173:24	applies	190:12	ascertain
176:6,12	138:2	around	157:3,19
APA	apply	6:21 101:7	ashamed
177:15,23	137:11,13	190:11 191:3	85:12,19
apart	171:20	203:11	asked
57:20 107:1	appointment	arranged	7:20,22 8:9,
ape	171:11,14	87:3	17 10:4,6
130:6,17	appointments	array	12:17 13:6,
apes	171:13	90:3	13,19,22
130:3,13,16,	appreciate	art	25:20 27:23
17,19	95:24 220:9	87:22 117:11	31:18 51:10
appalling	appreciation	article	71:9 115:19
86:4	87:23 95:22	62:9,13	127:1 131:1
appallingly	appropriate	67:4,5 85:5	134:2,6
36:24	119:10	96:4,23,24	149:12 162:8
apparently	212:23	112:5 113:4	164:10 169:7
36:3 62:24	appropriated	114:22 128:2	175:16
173:6 176:21	197:15	132:22 133:1	189:18
			196:17

208:11	assistance	187:18	attorney
asking	64:23	assuming	42:10 80:20
12:5,7	assistant	39:24 68:18	165:17,22
16:23,24	23:8 24:14	assumption	179:25
37:10 45:12	204:14	201:18 203:2	attorney/
49:17 51:9	Assoc	assumptions	client
54:14 75:4	177:3	129:1	165:21,22
95:1 106:21	associate	Athenian	attorneys
108:24	39:25 46:12	97:7 219:11,	26:10
126:17 149:2	48:6,10,13,	25	attracted
151:5 182:24	17,19 49:8	Athens	55:5,21
184:16,17	50:14 138:9	84:15,16	56:18 57:2
185:12	148:7 173:20	89:2 97:6,22	94:16,20
186:13,14	213:19	220:1,2	95:5,8
190:13	associated	atone	158:24
206:12 214:4	17:19 39:25	136:24	207:21
aspects	49:13 89:3	attached	214:16
101:16,17	177:2 179:16	1:24	attraction
assault	203:8 204:1	attack	86:17,21
27:17,24	213:6,15,18	28:5 39:16	87:5,20 88:5
29:18,21,24	214:1,7,12	68:9,17,18	95:11 208:1
216:21 217:3	215:3,14,22	94:15	attractions
assert	associates	attacked	208:6
112:23	34:14 49:10	41:9 46:22	attractive
139:22	204:12	68:12 134:13	95:13 98:3
asserting	associating	attempt	137:21 138:9
218:8	48:23 51:20	14:16 30:12	attributes
assertion	213:20,22	153:2,8,20	88:3
111:13	215:11	attempts	audio
assertions	association	173:13	62:10
174:25	16:21 17:14,	attend	auditorium
175:13	18 18:13	66:6	9:21
assertive	39:20 43:9	attendance	augment
86:3	48:23 49:4,	197:25	56:12
assessment	18 66:25	attended	August
157:21	177:3,14,15,	52:23 55:10,	4:3 170:14
assign	20 197:1,3	11 65:8,9	212:10
8:13	207:14,15	attendees	Austin
assimilate	208:16	66:4	1:2,19 2:5
83:2	213:7,17	attested	21:24 27:18
assimilationist	214:22	114:2	28:2 164:3
st	assume	attitude	Australia
82:21 83:7,	7:12 38:16	115:14	203:20
16	149:8	173:15	Austria
assist	156:19,23	attitudes	69:17
177:15	181:5 219:7	46:1,10,13,	author
	assumed	15 139:15	104:15
	79:4 98:18		

193:23	110:13	base	7:1 139:13
authorities	111:25	160:10	begin
22:8,10	112:11 116:3	based	77:22 98:15
authority	117:5 137:18	8:9 18:13,19	beginning
153:5 154:6	160:7	34:14,16	14:17,25
available	170:14,21	37:13 39:4,	begins
50:9 148:16	171:25	14,19 40:23	103:25
Avenue	172:25	43:6,9 44:14	behalf
1:19	181:12	46:23 54:12	27:6,7,12
average	195:25	64:15,16	behavior
95:10 97:20	205:11	68:15 69:24	44:14 101:6
Avi	209:18	71:15 78:10	112:14 128:2
35:18 165:14	213:5,11,13	83:9 90:16	129:19
166:1,10,14	background	102:14	130:10
168:18	16:21	111:12	139:21
198:9,13	backgrounds	113:11	142:12
204:15,25	14:15 120:21	132:24	behavioral
awake	bad	141:24 144:6	31:17
99:5	16:13 34:21	191:20	behind
awakes	101:16	basically	27:19 85:23
99:17	126:16,19,	52:1,6	beholder
aware	20,24 127:4	156:25	143:7
70:5 103:11	128:10 129:8	basing	Belgium
137:5 176:10	149:23 164:2	70:14 126:9	56:16
192:2	171:1 187:10	basis	belief
199:11,16	189:11	27:7,12	192:12
201:16,20	balance	28:15 42:13	202:12
216:2,11	116:6	43:3 45:12,	believe
awareness	balanced	14 46:4	6:1,21 10:10
120:22 121:2	101:16	bathroom	12:4 13:12
awful	balloons	47:10	14:3 16:18
107:23	7:3	beard-growth	18:5 30:12
awkward	ballot	97:10	37:1,14
125:1 149:9	81:9	beau	38:17 42:16
awoke	Baltimore	87:24	47:24 51:18
99:5	198:13	beautiful	54:10 56:23
	banned	86:17 87:21,	66:3 106:21
	159:19 200:5	22 106:1	107:2 115:25
B	209:23	beauty	120:13
	212:20	87:24 95:22,	131:12
babies	bar	25 106:8	132:10
123:17	208:12	107:4,13	134:14 138:1
back	barely	108:1,8	139:24
5:1 15:13	109:21	137:16	146:7,10,14
21:15,25	barriers	Beert	152:15
25:4 43:19	148:4	178:10	154:13,20
60:12 61:24		began	172:15
99:3 101:3			

May 25, 2021

9

175:3,15	24 153:16	183:22	5,11 74:20
179:1 184:7,	173:16	202:7,15	79:16 82:7
14 185:4	210:6,9	204:4	85:9,11,19
186:23 188:8	bias	bland	86:18,21
190:20,21	27:23	83:19	87:20 88:5
192:6 198:21	Big	blockers	91:19 93:15
199:7 203:20	105:13,16,19	119:15 120:2	97:17 98:2,
207:24 208:1	Bill	blog	3,12,14,25
213:15	165:16	4:9 174:1	99:8,19
216:19,23	bio	175:1 176:7,	100:15,25
believed	19:3	20 179:14	101:20
85:24 90:14	biography	180:21,24	104:22,24
159:16	17:25	181:2,7,8,12	105:3,8
below	biological	202:16	106:1,7
102:12	82:5	212:19 213:3	111:19 113:7
111:13	biology	blundering	114:9 115:7
beneath	99:11 122:22	131:4,10	117:19
174:7	130:21	board	118:7,13
beneficial	Birch	27:14 59:9	119:11 141:8
71:24	160:23	64:3,11	143:10
benefit	birth	65:15	144:1,9
8:16 109:17	123:22	book	146:8 147:1
110:3,4,16	148:15 150:6	75:8 78:7	150:9 177:3
benefited	bisexual	99:1 178:10,	207:14
70:1	101:24	11,24,25	208:15 213:7
benefits	102:6,17	181:23	214:22
109:24 110:1	103:14	188:16 189:3	216:3,12
111:18,22	121:16	books	boy's
113:9 130:24	132:17 148:8	101:9	85:2 109:23
185:8,14	159:11	born	140:18
187:4,7,14,	bit	120:20	boys
19,23 188:2	21:3 49:18	Boston	16:3 45:21
206:3,5,9,	74:2 110:16	59:4	58:7 67:12,
16,18,23	117:15,17	bottom	17 69:2,4,
218:23 219:1	159:17 171:4	25:3 89:17	14,22 70:1,
besides	205:6	96:21 195:10	3,4,6 71:5,
95:9 175:23	Black	215:5	18,25 72:2,
best	83:13	bourgeois	3,9 73:7,22
12:12 13:25	blackmail	67:21	75:19 85:7
47:14 174:8	105:6	box	87:11,15,20
better	Blakemore	129:1	89:15 90:6,
20:20 69:1	1:5 2:8,15	boy	12 94:16,20
89:4 92:10	9:19 11:5	16:12 47:5	95:5,8,11,17
115:13,15	16:19,25	60:6 66:25	99:25 100:15
125:14	17:21 18:10	70:15,24,25	101:8,22,24
131:22	30:18 40:5	72:7,12,13,	102:5,17,18
140:14	166:25	16,22 73:4,	103:9 104:4,
149:2,8,15,			11 105:24

106:13,23	Briggs	by-product	cancellation
107:3,7,11,	81:9	139:7,19	68:10
14,17 109:2,	bright	140:13	candidates
3,4,19	147:12 167:4	by-products	39:21
110:4,16,25	190:22	138:21 141:8	canil
111:1,9	bring		83:19
112:23 113:1	20:17	C	capable
118:20,24	broad		33:7,12,22
119:19,25	49:9	CA	34:4,8,21
120:5,21	broaden	1:4	111:14
121:1,4,5,	133:18	California	130:14
13,14,16	broader	81:9 122:24	188:10 218:8
127:21	74:23 76:6	call	capacities
130:25	Brooklyn	17:19 19:20,	120:25 186:9
136:11,12,13	179:10	23 22:12	capacity
137:12,13	Brother's	42:11 54:25	112:22
138:2,5	105:13,16,19	60:7,8 78:25	157:15,17
141:25	brothers	82:13,15	158:5
142:1,2,5,6	93:25	149:18,21	car
143:21	brought	194:8 214:12	141:1
144:18 146:8	5:21	218:2	card
147:18	Brown	called	213:25
148:5,14	211:14	32:8 57:8	care
149:3,4,14,	Bryant	64:2 77:8	8:2 80:9
21 154:11	81:5	86:24 160:21	122:21
158:5,11,18,	bud	163:20	146:11
20,22 159:6,	47:14,24	calling	158:24
9 177:4	51:11	50:16 93:2	careers
182:9,20	building	calls	83:19
184:9,12	21:16	171:19	careful
190:9,11,17,	bulk	Camara	37:15
21 191:2,3	66:12	2:4	186:21,22
192:25	Bulletin	camera	carefully
207:7,10,16,	134:18	180:18	176:3,6
22 208:20	bumblng	camp	Carmen
209:1,12,16	143:19	190:7	23:7 24:15
215:24	Boys '	campaign	29:9 31:18
Boys '	3:19	39:11 41:6,	carrying
branch	191:3	21 81:5	213:25
38:2	buried	139:13	case
Brantley	48:4	campus	64:2,22
2:9	bury	33:13,22	66:17 81:2
breach	50:23	34:25	86:11 106:22
162:3	Butch	canard	113:14
break	26:7	104:16	119:24 136:5
61:15 74:2	buyout	105:21	150:6,7
160:1	170:16	217:25 218:2	152:20

164:13	47:3 52:10	character	21,25 151:9,
177:24	70:13 73:6	87:21 90:9,	20 152:5,17
210:24	74:5 76:6	16	153:2,9,20,
cases	83:12 85:8	characterize	21 154:10
50:4 80:24	92:15 101:21	139:16	157:2,13,18
97:24 105:6	104:23	charge	183:8 192:19
108:11 126:5	118:11	13:14	214:17
142:9 143:4	122:16 132:7	charges	218:24
151:11	133:23	80:16 163:22	Chinese
152:4,7,19	134:10	202:1	114:5
189:14,15	175:21	chase	choice
cast	176:15	88:18	69:16
212:20	183:17	chatter	choices
category	184:10	22:13,17	119:25
70:15	189:13	checked	choosing
cc'd	199:24	161:3 175:3	79:25 113:2
27:14	200:24	Chicks	Chrysippus
ceased	certainty	32:8	85:4,9
200:22	37:12 40:17,	child	110:22
celebrated	18 52:10	32:2,5,18,22	church
90:23 91:17	Certificate	33:23 40:1	18:3 156:24
92:12	3:6	48:11 60:20	circumstances
celebrating	Certified	72:8 75:25	119:14
114:17	1:21	80:2 81:14,	citation
celibate	cetera	15,18,20	64:2 104:6
56:22 207:25	189:25	82:1,9 91:4,	cite
Center	Chaffin	12,24 92:1,	70:9 104:5
6:9,12	182:6	13 93:10	113:23
centers	chair	139:24	141:19
122:11	166:6 169:8	141:16	cites
century	170:21	151:7,25	135:22
67:20 77:5,	174:10	152:5,10	citing
6,12 89:13,	213:24	154:4 157:21	47:16 104:13
19 91:7	chance	193:3,9	citizens
97:22 220:2	13:11 33:3	217:17,23	80:12
certain	163:3	child's	citizenship
32:7 35:2	Chancellor	152:8 153:11	115:2
41:1,2 98:3	28:9	154:5	City
101:15	change	childhood	64:8 165:17
115:5,6	60:15 158:4,	56:15 71:10	civil
125:9 129:15	11,17 160:10	children	1:23 57:8
155:12,14	181:7	13:2 18:21	civilization
158:7 200:23	Changes	40:13 55:6	108:3,14
203:22 220:1	3:5 198:23	76:10 80:15,	114:4,5
certainly	chapter	16,20 81:3,5	civilizations
12:24 16:22	67:16	132:18	183:15
30:2 36:20		149:14,19,	

claim 27:2,5 28:19 195:4	clearly 98:22 185:25	collaborators 92:21 93:8, 23	130:10 148:21 150:7 152:6
claimed 163:11	client 29:14 32:17 33:7,21	colleague 171:1	185:24,25 186:3
claiming 28:15 43:4 200:6	34:19,23 42:7 46:16 200:1,8,12	collecting 50:19 110:21	commonly 187:18
claims 47:14,23 48:6,7,10 51:3 74:12	201:21,23 202:24 204:11	collection 62:9,13 182:9	commonplace 109:15,22 110:15 111:20 113:6
class 6:8,20,24,25 10:2,5,9,12 12:13,19 13:1,18 14:2,11,17 15:8 16:11 21:7,9,13 36:6 83:10, 19 94:2 121:11 212:9	client's 168:3	college 24:21 173:19 179:10	communicate 116:23 133:21
classes 10:13 100:6 122:24	clients 117:6	colonies 130:19	communication 24:8 201:23 202:1
classical 6:6,7 94:5 97:6 197:16	close 43:9 57:19 87:16 120:23 218:14	come 15:3 16:4,13 30:15 59:4 61:7 88:15 104:11 113:5 119:17 120:23 134:8 135:17 146:6	communication s 24:14,20 28:5 166:9 201:10 210:17
classes 10:13 100:6 122:24	closed 33:16 80:2 156:24	comes 209:5	Communist 49:13,14 213:24 214:1
classical 6:6,7 94:5 97:6 197:16	closely 46:11 51:2	comfortable 118:19	communities 130:19
classicist 173:19 177:7	closer 6:15 20:17, 24	commented 163:21	community 61:13 207:6, 9,15 208:4 215:21
classics 4:4 163:18 171:16 176:14	coaches 122:23	comments 15:4,11 165:10,11 177:6	comp 127:3
classists 179:15	code 203:21	Commission 26:24	compared 122:25 142:11
classroom 5:18 7:7,10 9:5 35:6	coerced 92:16	commit 50:7 118:4 148:21	competition 153:5
clear 45:10 53:5 60:1,2 104:14 144:16 146:19 203:12	coercion 132:11 216:1	commitment 57:8	competitive 130:19
	coercive 70:17,18,20, 25 71:2,13 75:2 100:13 142:9	committed 85:13,15 137:25	compiling 71:14
	cognitively 157:10	committee 65:2,5	complained 28:1 211:1
	cognizant 139:21	common 78:23 119:15	complaint 4:11 26:19,
	coincided 82:20		

21,23,25	concerns	confrontation	157:22
27:11 28:10,	30:16 31:17	34:12 44:14	158:17
15,19 66:16	44:16 45:20	168:12	188:10 209:2
195:6	218:20	confrontation	217:24 218:8
complaints	concerted	al	consents
31:1 162:19	12:23	30:13	82:7
completely	concluded	confused	conservative
56:22 102:16	27:22 134:23	90:21	14:15 17:17
140:18	219:23	confusing	39:17 42:16,
207:25	conclusion	27:23	21
completing	18:24 88:15	congratulate	consider
156:18	113:5 202:7	68:3	36:4 83:23
complex	conclusions	congratulating	100:19
137:1	39:3,4 77:25	g	119:24
composed	condescending	68:6	123:10 137:7
172:18	149:19	Congress	144:8 159:7
comprehensive	conditions	1:19	181:13,19
14:21	115:5,6	connections	184:25
compromised	conduct	107:25	consideration
174:24	82:8 218:24	conscious	82:22 159:4
compulsivity	conducted	218:7	considered
142:25	71:17	consensual	18:7 32:22
computer	confer	87:6 103:6	77:21 87:7,
20:17 219:15	109:17	143:4 144:2	18 90:8
computerized	conference	184:11	103:4,5
1:22	57:16 65:21	consensually	111:9 144:5
conceal	66:2,3,6	81:22	169:16
54:3	176:8 196:12	consent	183:21
conceived	197:10	3:16,19	considering
66:12	203:11	15:25 45:7	78:8 158:2
concept	conferences	56:1 58:6	consisted
89:23 90:19	57:16,19	60:1 69:19,	86:12
114:6 150:25	196:4,7,9	21 86:5,6	consists
151:6 152:20	197:22,25	96:11 100:19	50:17
concepts	conferred	101:13	conspiracy
90:3 152:22	110:16	102:9,11,12,	80:14
conceptual	confers	19 111:11,15	constantly
89:14,20,22	109:24 110:1	112:23 114:6	213:3
90:1,5	111:21	118:19	constitute
concern	confidential	119:4,10	187:6
95:15 159:8	162:6	120:5 136:3	cont
218:19	confirm	138:17,23	4:1
concerned	106:10	139:7,11,22,	contact
21:7 22:14	confirmed	25 140:6,14	57:24 58:9,
57:10 136:7	103:16 205:2	141:8,16	17 61:3
137:10	conflicts	143:6,9	65:20 71:11
149:20	86:1	144:6 154:14	133:19

156:23	contract	correct	correspondenc
182:10	66:12	19:18 22:21,	e
189:8,10	contradiction	24 29:15	40:6
200:22,23,25	70:22	31:17 32:25	cost
202:11 216:2	contrary	34:11,19	148:3
Contact's	108:15	35:14,17,23	could've
201:2	contribute	45:21,22	110:17
contacted	220:8	46:5 48:20	counsel
203:15	contributions	50:14 55:6	20:2 26:5
contacts	78:20 182:8	62:19 63:25	38:1 161:25
217:15	control	64:3 65:2	counselors
contemporary	95:13,24	68:7,23 69:5	190:8
67:23 211:18	123:22	79:1 84:15	counterpart
219:5	148:16 150:6	88:19 95:21	83:6
contends	controversy	97:11 106:9	counterproduc
189:13	132:25	109:2 115:20	tive
content	controverted	124:1 132:21	139:3,4
14:20 15:21,	29:22	133:1 142:3	countries
23 22:3	converts	143:11	61:2 69:17,
contention	109:23	157:23	20 92:5,8
44:22 81:7	convicted	162:17	115:10,12,14
contents	40:1 74:4,8	170:14	141:12
195:15	75:5,13	171:25	country
context	182:10	172:23 174:1	61:1,4 68:12
16:1 37:16	189:22	177:11	County
45:10 51:7	192:10	178:23	42:10 80:19
56:8 89:5	convinced	179:24	couple
111:3 126:22	116:24	182:16,17	6:25 10:1
139:2	convinces	183:20	12:23 15:9
187:21,23	72:25	184:12	35:24 43:19
189:20	convincing	189:22 195:5	52:7 57:6,20
208:24	73:2	204:1 210:19	58:14 77:6
209:19	copies	218:18	156:14
215:16	170:9 172:15	corrected	161:15
contextualize	copy	181:1	198:25
d	4:11 23:14,	correction	coupled
88:1	15,16,24	161:8,13	157:20
contingency	62:2 164:25	corrections	course
145:5	195:4 205:8,	160:11,15	7:21,23
continue	9 220:24	180:25	15:5,11 74:7
28:11 139:5	cord	198:23	97:20 114:20
159:19	180:5	correctly	169:3 197:8
continued	Cornell	124:7 147:24	209:22,24,25
139:13	101:9	208:21	210:9,14,17,
continues	corporation	correlations	19,22,23
46:11 88:17	205:2	103:7	211:2,6,14,
		corresponded	16,17,22,23
		181:6	

212:12,20	202:17	141:16	date
courses	criticism	169:19	5:24 6:2
217:1	134:8,12	183:16	172:21
court	143:25	curricula	211:15
1:1 3:6 4:14	173:10	122:2,10	David
167:21	criticize	curriculum	24:10,13,21
couverts	92:19 93:6	123:23	35:21 41:24
136:10	123:23	124:3,12	43:24 47:18
cover	criticized	125:19	67:16 79:4
66:8,14,19	37:19	cut	80:6
120:6	criticizing	180:4	Davidson
COVID-19	177:7		4:5,6 178:7,
1:23	critique		23
create	27:14 91:2	D	Davis
123:17	critiqued	dad	201:10
created	28:8	125:5	day
48:2	cross	daily	5:17 6:19,24
creating	31:23	133:22,23	21:18 22:11
93:25	210:14,23	Dallas	25:8 80:9
credence	cross-list	161:13,18	104:23 174:2
163:22	211:14	damage	days
credibility	crossed	172:3	67:20 68:22
31:4 74:15	16:22	damaged	de
193:23	crossing	171:3,7,10	198:9
credible	16:23	Dan	dead
192:5,11	Crossroads	16:21 18:14	30:4
193:19	203:21	39:20 41:21	deal
credibly	crowd	43:10 46:12,	84:2,8 121:8
45:5	168:20	15	167:18
creditability	Cryogenian	danger	dealings
74:8	110:24	44:22 45:5	26:15 154:12
crime	CSR	122:11	deals
50:7 76:12	5:4	dangerous	101:9
192:13	cultural	42:4,8,9,12,	dean
216:4,11,13,	187:21,23	17,23 43:5,	24:14 170:3
18 217:9,10,	culturally	13 61:13	211:1
12,18	109:13	123:11,14,	dean's
crimes	culture	15,18	170:2
192:3 216:15	206:20	dangers	debate
criminal	cultures	124:21	28:11 189:7,
94:13	140:6 141:12	Darth	9,11 220:8
criminals	Curly	42:11	debunked
54:7	66:17	data	80:25 134:16
critical	current	69:25 72:1	decade
122:14,15	1:23 59:22	76:7 81:17	80:1,7,15
175:21	105:1	100:8	decades
176:13	106:13,25		68:20 77:6

154:24 159:1	define	denominations	designate
219:9,23	39:5 58:18	18:8	162:5
December	81:20,21	denounce	desired
195:8 199:22	86:7,8 183:4	80:20	71:14 143:13
decided	193:7 209:13	deny	desires
164:1 210:5,	217:20,21	11:8	119:23
9	defined	department	destroyed
decision	144:12,14,	21:23 36:7	26:2
210:19	19,23 145:4	163:19 166:6	det
declaration	146:2	170:21	48:4
195:8	147:10,22	174:10 210:5	detailed
declare	184:7	213:24	27:14 164:12
119:11	definition	depending	172:18
declining	29:21 38:11	48:19 73:15	178:13
82:6	39:7 70:25	depends	179:17
deed	144:25	48:15 73:2	details
68:22	145:15,17	81:20 86:11	9:8 86:11
deer	146:3 148:1	119:13	detected
30:4 32:17	153:13	199:15	22:13
33:25	185:10 214:2	213:19	detention
deet	217:2	217:20	56:13 57:8
134:20	defunct	depose	determine
defamatory	52:1,5	203:4	154:21
162:22	degree	deposition	determining
170:23	50:14	1:11,18 5:5,	100:11
183:22 184:8	demand	9	detract
215:8,9,10	161:12 163:9	derived	10:8
defend	164:16	145:20	detrimental
169:18	203:17	describe	48:5 50:23
defendant	demanded	6:23 38:19	developed
1:20 2:8	1:5 161:8	64:18 177:10	157:10 192:7
7:1,4 28:6	demands	described	development
63:7 91:15	160:11,14	68:14 77:9	130:7 132:20
166:24	democracy	147:6,9	devotion
202:22	3:13 67:7	describes	90:17
defendant's	89:2 112:6	65:1 208:19	dichotomists
51:5 163:20	114:23 220:3	209:11	90:8
202:3	democratic	describing	Dictionary
defendants	84:16,19,20	150:24	144:13
1:6 164:2	90:25 91:18	description	Diehl
defending	110:6 112:4	3:10 4:2	4:3 170:14
88:17	demonstration	211:16,17	diff
169:22,24	200:13	deserved	60:14
Defends	denied	10:10	difference
58:18	148:6,13	deserving	103:13
defensive	Denison	192:12	142:22 155:1
84:23	173:20		216:8

differences 142:13	Disaster 1:23	22:1,3 55:18,19,25	DIVISION 1:2
different 21:16 39:23 51:8 55:2,3 88:15 100:19 114:19 119:9 120:4 140:19 157:15 185:13 187:24	discarded 26:2	127:12 179:5	Dobbs 165:16
differential 99:23	discharge 64:24	diseases 122:13,19 123:7	doctor 156:16 220:10
differently 67:12	discipline 95:14	disgruntled 12:16 14:5	doctorate 156:18
dignify 173:16 174:8	disciplined 89:3	dismisses 88:18	doctors 80:14
diligent 176:16	disclose 162:3	disorder 134:15	document 11:12 17:15 27:18,19,22 63:16 162:6 163:4 195:14
direct 38:10 130:11 188:25	discourage 208:5	dispute 26:3	documentary 10:15
directly 8:23 19:15 177:2 179:16 181:19 200:23	discouraged 149:3	disruption 21:7 35:6	documentation 27:19 31:5
director 24:20	discourse 91:9	disruptive 171:2 201:9	documented 10:14,20 97:1 109:12
dirty 151:10	discovered 80:1	dissuade 87:13	documents 66:15 179:2
disagree 58:19 77:25 78:3 81:14 187:3 206:1	discovery 23:1 200:17 201:1,15	distinction 78:16	dog 166:21
disagreement 178:8	discriminate 75:7	distinguished 70:17	doing 9:23 14:3,8 34:21 53:16 56:11 74:17 83:12 102:21 127:14 128:10 129:17 149:11 150:4 156:21 170:4 211:4
disappear 25:2	discriminated 27:7	distortion/ unintelligibl e 62:10	dollar 27:15
disappointed 178:25	discriminatio n 27:2,5 195:4	distract 14:2	dominant 91:8 110:7
disapproves 16:19 152:8	discuss 179:25 181:7	distribute 36:5	dominate 154:6
disapproving 16:25 18:11, 15	discussed 12:23 93:12 110:23 128:2 206:19	distributed 63:1	domination 154:6
	discusses 66:2	distributing 32:24	
	discussing 27:20	distribution 31:10	
	discussion 15:2 22:5 125:2,20 126:7 138:16 179:13	district 1:1 42:10 63:23 80:20	
	discussions 9:4,10 15:12	distrustful 88:23 90:11	
		disturbance 24:18	
		disturbs 129:3	

Don	23:8 25:19,	90:23 91:7	effect
206:8	22 31:18	103:18	7:25 28:9
Donald	dull	112:18	36:8 43:10
156:15,17	83:18	199:22 220:5	74:18 75:19
door	duly	earning	76:3 105:14
7:7,13 9:5	1:20 5:11	153:11	143:18
doors	dynamic	eastern	182:19
7:8,9,11	67:11 73:1	114:4	effective
doses	dysfunction	easy	157:20,22
119:22	142:25	8:15	efforts
double	dysfunctional	economic	139:20
7:8	121:5	87:3	177:10
doubled		edification	eight
171:24		205:15	197:13
doubt	E	editor	either
176:23	e-mail	190:1,2	74:22 112:24
202:20	2:7,12	191:12,25	118:20
doubtful	24:10,23	192:6	122:22
212:11	25:4,7,23,25	editorial	154:19
Dover	26:6 29:9	161:17	elders
78:5	36:6,13,14,	editorials	124:17 218:6
Dover's	19 39:9	161:15	elimination
77:22,25	41:18,23,24	Educate	211:18
downside	43:16,22	90:2	elite
85:7	47:12 57:5	educated	97:4 98:8
drafted	133:21	17:8 39:1,19	108:2,13
35:16	166:1,14	41:8,10	109:17
drawn	205:13	46:16,20	110:1,5
63:7	e-mails	education	111:1,2,6
Drive	3:11,12,24	64:3,11	112:4,14,15
5:8	4:12 24:23	67:25 97:9	114:19
driver's	26:3 35:13	115:15	elites
140:1,3,9,	165:14	122:2,10,17,	110:7
16,21	205:11	20 123:3	elix
driving	earlier	124:9,12,20	209:2
140:17 141:1	20:10 82:16	125:1,11	eloquence
dropped	91:17 92:12	131:23	120:22 121:2
7:21,23 8:24	96:17 128:2	157:20	else's
drops	136:11	186:25	175:19
88:17	139:6,8	educational	embarrassing
drugs	140:13	8:16	167:23
72:7 139:3	178:11	EEOC	embedded
due	187:14	4:11 26:19,	158:6
81:12 170:23	earlieth	20,23 27:11	embody
220:4	77:12	28:14,19	120:25
Dukerich	early	195:6	embraced
	24:8 77:12		75:3

Emergency 1:23	engaging 127:22	epistemo 43:7	esthetically 108:2,14
emotional 143:22 152:6	143:21	epistemologic	estheticizing 108:2,13
emotionally 131:4	147:19	al 37:10,22,25	estimated 63:25
emotions 88:23	England 76:19 77:1,	40:17 43:7	et 189:25
emphasize 151:9	12 91:7	52:9 93:3	Euripides 110:24
emphasized 67:9	English 144:13	epistemologic	Euripides' 85:11
emphatically 113:1	enjoy 101:23	ally 128:19	Europe 148:18
Employment 26:24	107:22	Epistemology 38:2	evaluate 176:4
en 120:25	enjoyed 73:23 98:24	equal 26:24 67:24,	evaluated 101:13
encourage 48:10 125:7	99:18 100:24	25 78:21	evaluates 176:6
153:14 209:2	193:1	79:17 130:7	evaluations 15:5,11
encouraged 175:15	enlightened 67:20	equally 101:16	event 5:20
encourages 112:3 209:8	enrollment 212:8,16	131:15 149:9	eventually 51:3
encouraging 125:7,12	enter 7:13	152:14 208:4	everybody 83:20 120:6
enculturation 109:17 110:2	entice 105:4 107:2,	equate 95:23	everyone 49:9
112:4	3	equivalent 183:15	evidence 14:6 16:24,
end 16:13 80:1	entire 36:19 56:16,	era 138:22	25 17:3,6
138:16	22	139:14	18:9,16,17
208:20	entirely 77:2 128:6	erastés 78:11,13,17	19:17,23
endeavors 202:18	135:10	79:2 112:17	30:22 42:7
endorse 198:18,19	187:24	erected 148:4	44:9,23
endorsed 87:10	entities 199:8	erectile 142:24	47:19 56:24,
endowment 169:8	entitled 188:15,16	erects 98:24	25 74:6 82:5
ends 176:17	entity 62:25	erotic 86:19,22	92:4,9 94:7
enforced 114:12	ephebophile 183:16	87:5,23 88:6	99:24
	ephebophiles 183:10	155:1	108:22,25
	214:19	erômenos 78:11,14	109:6,21
	ephebophilia 218:20	79:3	110:10,20,24
	episodes 98:11	essay 148:12 151:8	111:17
		establishing 73:25	112:8,24
			113:1,12

115:10 119:5	excuse	expensive	EXPERIMENT
137:4,5,8	6:5 41:22	167:21	108:18
140:5,10,13	53:1 93:4	experience	experimentati
141:11,24	159:23	8:10 14:7	on
142:4 143:3	169:13	38:15 73:14	136:8
176:17	206:11	74:25 75:1,	experimented
179:18,20	exhibit	14,15 76:13	70:15
200:16,17	3:10 4:2	78:10	explain
210:4 215:16	23:10,12	101:13,25	38:2 57:12
218:4	24:25 25:1,9	102:9 107:25	99:3 111:8
evidenced	29:5 31:1	114:13	129:20,24
18:14 200:25	32:16 35:12	116:12	explained
evolution	36:13 46:12	125:22	8:14 139:10
130:11	61:23 62:7,	126:4,5,10,	150:1 183:7
138:17,18	16 63:15,17	11 130:13	207:2 210:20
evolutionary	67:1 96:10	137:14	explaining
130:11,20	155:21,22	142:14,16,	181:25
ex	156:2,7	17,18	explicit
66:2	159:21,22	145:11,13	12:7 17:5
exacerbated	162:12,15	146:1,9,22	explicitly
28:7	164:21,22	147:1,6,10,	12:8
exact	165:12,13	19,21 167:18	exploitative
13:23 22:3	170:7,8	184:24	115:18
73:13 106:17	172:10,11	192:25 218:5	exploited
exactly	174:20	experienced	117:1
77:4	178:5,6	27:20 31:22	exploiting
exaggerated	180:19,20	35:20 70:4	117:3
91:13	181:20,22	117:11	exploitive
Examination	182:5 195:2,	120:19	116:1
3:5 5:12	3 205:16	127:25	exploits
examine	211:10	131:3,9,14	32:10 67:12
212:24	213:9,10	150:11	express
218:21	exhibits	experiences	30:16
examined	3:8 4:1,15	56:20 71:10	extempore
19:16 73:18	156:1	100:16	10:23 12:14
examining	existed	101:3,12	extensive
124:9 142:13	52:2 53:14	102:8 103:1,	58:14
exception	199:18	2,3,4,5,19	extent
214:11	existing	143:22	34:18 95:20
exceptional	52:11 60:16	144:10,13,	102:23
210:25	exists	14,17,19,20	108:22,25
exceptionally	161:4	145:2 147:14	109:19
49:9	expect	192:21	110:10 112:7
exchange	176:3	194:19	158:25
9:17	expected	208:20,22	192:12 199:9
exchanges	170:19	209:12,17,18	201:13 202:2
57:5	expense	experiencing	
	169:16,17	35:25	

May 25, 2021

21

extra 120:24	fail 72:19	81:1	feels 135:11
extrafamilial 120:24	failed 81:13 211:17	far 100:15 165:9 175:8 178:17	fell 84:14
extraterritorial 60:23	failure 44:15	185:5 186:23 201:14	fellow 56:9 133:6 163:15
extreme 80:8 114:13	fair 15:15 163:3 172:6,9	fashionable 114:18	felonies 216:15
extremes 68:19	181:10,13 203:6	fast 206:6	felons 74:4,9
eye 143:6	fairly 58:17 122:17 212:8	fatally 27:22	felony 192:11 216:15 217:4
<hr/> F <hr/>		father 39:10 40:5, 16 41:5,20 42:8 43:4 46:5,8 47:15 51:3 85:16 97:16 121:14,17 152:22	felt 28:4 53:8 67:8 73:24 110:25 162:21 164:12 169:21 181:14 182:1 198:19 203:13 211:25
F-L-A-W-N 6:13	fallen 178:17	father's 17:25 39:15, 19 46:16 205:1	female 23:25 45:3 79:18 85:24 137:15,24 205:10
F.3d 3:15	false 11:19,23 28:17 47:23 63:6 104:17, 18 170:23 173:14 177:17 202:1 205:21,24	fathers 68:12 120:22	female-to-male 119:21
face 93:20	fam 125:15	favor 84:15 178:17	females 45:8 82:4 135:8 136:18 154:18
Facebook 19:1 29:15, 17 31:25	familiar 57:11	FBI 60:22	feminist 141:22,23
facilitating 201:4	familiarity 38:10	fear 151:19 152:17	Fenves 27:14 28:4
Facsimile 2:6,11	families 121:5,6	feasible 136:9	FERPA 36:4
fact 12:22 17:13 18:7 41:1 45:6 46:11, 19,22 49:1 54:12 84:6 87:12,19 92:8 110:25 123:15 155:1 177:23 186:11 201:18 217:23	family 16:21 17:18 19:6,11 40:3,5 46:11 56:16 83:10, 11,13,15 87:4 97:9 120:21 121:11 125:1,11,16 152:23	federal 1:22 61:6	fiction 94:1,15 139:6 218:2
faction 170:25	family's 18:13 43:9	feed 165:9	
facts 34:23	famous 33:5 80:18	feel 32:9 38:15 70:1,2 71:19 85:20 107:22 121:8 155:19 170:22	

May 25, 2021

22

field	101:25	7	focuses
37:17 134:19	107:20	fits	103:12
171:17 182:2	172:25	115:8	focusing
fields	174:22 184:2	five	10:9
183:12	203:4 213:3	10:6,11	follow
Fifth	findings	38:15,25	127:18
97:21 220:2	63:23	41:2 154:24	186:17
fight	finds	195:19	following
169:17	72:22	212:11	173:1
fighting	fine	five-minute	follows
56:13	6:16 178:4	13:18 21:6	5:11
figurative	finish	Fix	force
32:20	47:11	180:3	118:2
figure	finished	flawed	217:14,15
71:18 97:16	156:20	27:22 219:24	forcible
121:14	finishing	Flawn	86:7 148:20
file	21:13	6:9,12	foreign
166:2,3,5	fire	flexibility	61:1 89:2
167:16,23	64:14	115:1	204:23
168:4	fired	flip	forget
filed	81:11	121:25	150:13
169:20	first	flyer	199:24
filing	5:11,20,21	5:18,25 6:2	forgotten
166:16	7:17,18	7:15 9:6,11	61:18 68:4
167:3,7	12:17 13:18	10:4 11:1	form
fill	24:7 30:15	16:15 25:18	10:15 11:10,
50:17 74:15	31:1,21 51:1	30:9 31:10	24 12:3
fille	62:16 65:8	32:24,25	17:2,4
166:19,21	73:13 74:24	35:16,23	18:12,25
filling	75:1,14	44:20 45:15	19:9,19,24
75:22 100:1	76:13,24	51:5 66:18	20:3,4,11
filter	77:6 86:18,	162:19	28:21,25
73:10	22 88:5	163:20	30:1 87:1
final	96:20,22	168:6,13	91:8 100:9
64:22	100:13 104:6	173:8 174:12	120:7 122:12
finally	116:12 121:9	175:6 183:22	154:9 166:5
187:12	122:7 133:6	184:7	194:21 216:1
193:13	142:14,15,	200:11,14	formal
finance	16,18 143:2	201:4,23	55:17 59:15
170:2	151:4 178:24	205:7 213:13	197:1,3
financial	190:4,6	flyers	formally
153:5 154:7	204:8 210:15	7:4	213:8
find	212:7	focus	formative
15:2 17:17	first-hand	94:9	101:4
26:1 32:15	34:13	focused	formed
35:3 79:24	fit	9:22 188:9	58:10 141:17
95:10,12	84:19 115:2,		

forms 90:10 148:14	Francisco 122:18	full 76:24 97:10	gave 13:11 85:1
formulated 110:23	free 69:3	103:23	143:9 163:22
129:14	freedom 28:20 29:3	fully 141:17	179:20
formulating 24:17 58:3	58:5,6 69:8,	170:19	193:13
fortunate 94:14	9,12,13	functioning 142:24	211:2,6
fortunately 81:13	119:19	functions 63:22,24	gay 14:15 16:16,
forward 31:8	139:23	fundamental 139:23	19 17:1,14
found 17:5,10	141:13 148:7	fundamentalis t	18:11,15
60:17 103:16	154:14	17:21 18:20	43:11 46:24
114:12	freely 69:4	fundamentalis ts	67:23 69:2,4
116:14,16	French 166:21	17:20 18:6	70:3 73:7
137:21	frequent 58:9,17,18	fundamentally 84:19 89:2	75:23 81:6,
168:15 193:9	107:11	112:6 114:22	10,11 82:21,
202:16	Friday 25:7,9	funding 28:12	25 83:2,8
203:20	friend 41:20 58:2	funds 169:7,12,23	91:6,9 92:20
foundation 57:9 58:3,9	64:5 126:15,	170:1	93:7,20,25
59:7 71:9	23 127:19	furthering 215:21	94:9,10,14,
73:21 84:2	128:10,12	Futmoore 202:16	19 95:8,10,
160:21	129:7	Futo 173:18,25	17 98:12
165:23	friendly 33:19 35:3	175:12 176:6	101:2,8,10,
Founding 68:12	198:1	202:16	24 102:5,17
four 59:2 81:2	friends 165:7 190:8	future 16:6,9 85:15	103:14
154:24	204:12	111:2	121:5,16
179:16,19	friendships 87:16	G	126:4,12
204:2,3	fright 123:10		132:17
219:23	frightened 32:14 35:5		135:16,20
Fourteen 82:4	frightens 123:10		136:5,6,11
fourth 89:13,19	front 7:8 13:13		137:10 148:7
166:13	23:12 43:20		153:15
frame 21:2	199:4		156:18
framed 168:19	fulfill 135:12		158:22
framework 78:8			159:9,11
			168:24 183:2
			gay-oriented 69:14
			gays 81:7 83:18
			93:13 94:4,
			11 126:12
			gender 43:1 118:25
			119:16
			120:1,9
			164:13
			210:12,13,18

gender-neutral	girls	177:1,10	graphic
141:23	45:21 69:22	215:13	112:24
143:17	75:25 95:12,	going	grave
144:1,5	19 100:17	5:14 10:24	181:19
general	118:22,24	96:1 123:11	great
104:17	120:5 138:6	149:8 162:11	73:6 84:2,8
124:17	148:5,14,17	167:7 180:14	109:17,24
194:10	149:3,14	218:7	110:1
generally	150:7	good	111:22,25
68:8 74:22	gist	8:12 20:21	112:11 121:8
77:21,24	127:3	35:8 54:7	155:5 167:18
78:17 79:9	give	76:8,9 87:21	201:2 219:21
81:6 84:7	13:23 50:4	97:9 101:16	greater
87:17 88:20	62:1 98:25	104:4,12	110:16 130:2
98:18 115:13	111:11,15	124:23	141:1 150:5
171:13	115:15	126:25	greatest
192:15	118:13	129:11,17	155:1
210:22	125:20	131:5 141:9	greatly
generating	139:25	149:22,23	27:24
124:5,13	154:14 156:3	158:1,20	Greece
genre	157:21	174:24	4:8 15:13
32:7	162:4,7	178:24 193:4	16:1 69:3,8
gentlemen	176:13	google	78:23 84:14
191:21	195:19 196:5	175:2,10,16	87:1 99:3
genuine	211:8 217:24	googled	109:12,20
44:16 54:24	given	174:21	110:14
95:6	4:14 19:5	202:15,21,24	111:25
genuinely	22:25 23:16	Gotcha	113:11
46:7 120:1	35:8 39:6	59:10 97:5	114:2,17
George	62:25 72:7	gotta	187:22
198:8	114:10	74:12 218:13	206:20,24
204:16,19	119:14 126:4	governed	208:13 219:2
Germany	137:14	89:4	Greed
69:16 91:7	157:18	grab	67:10
92:7 115:8	159:1,3	20:22	Greek
get all	163:3 185:10	graces	4:6 14:20,21
155:16	giving	120:22 121:2	62:13,18
getting	87:24 104:7	grade	68:22 76:17
7:22 8:12	119:25	7:22 8:9,12,	77:21,22
10:2 141:2	126:17	17	78:13 79:25
girl	157:16	grader	82:20 88:22
100:15	glad	8:13	97:18 106:10
119:11	83:1 220:11	graduate	108:22
138:11	Gods	21:22 36:7	109:1,19
148:18	16:7,9,10	164:3	110:10,19
150:10	goes	granted	111:11
	52:17 61:1	104:4	112:8,24
	72:21 105:8		140:5 178:20

Greeks	guess	handwriting	20
3:17 4:6	17:8 18:13	62:16	head
89:12 96:13	39:1,19	handy	70:9 200:19
97:18 106:11	41:8,10	25:2	201:8
111:10 140:8	46:16,21	happen	headed
207:2 219:2	150:18	10:24 98:9	213:24
Green	199:18	141:19	health
164:17	213:21	happened	92:10
202:11	guessing	5:25 6:23	115:11,13
Green's	39:18 40:21,	8:7,25 9:25	154:23
51:5	23	21:11 35:8	healthy
Greenhill	guilt-by-	80:23 85:12	123:13
1:19	association	154:23	hear
Greta	47:17	191:17	16:8 20:6,20
192:1	guilty	210:24	38:14 53:15
grew	48:11 179:20	happy	62:11 78:25
78:9 182:10	gun	161:22 210:8	161:25
groom	29:20 31:25	harassment	180:6,12
190:9 191:2	32:12,13	27:18,25	197:2 204:17
ground	33:25 34:4,	harm	219:16
168:21	6,20	11:13 42:24	heard
grounds	guns	43:1,5 69:12	10:18 12:18
49:16 57:10	29:20 31:24	109:16	13:2,6,19
group	32:8,11 33:9	111:21 113:8	52:10 58:2
52:3,24,25	guys	135:9 136:2,	105:12
53:2 54:23	94:1	19 181:19	180:13 202:3
55:4,20		185:5 208:2	204:8
143:1 144:11	H	harmed	hearing
200:6,19		28:2 70:2	6:16 21:3
201:9 202:2,	Halperin	110:25	116:10
3,6,10,13,14	67:17 79:4	harmful	hearsay
213:8 214:8,	80:6 82:19	72:10,13	19:17,23
13,14,23	Hamilton	111:5 113:25	heavily
215:23	62:19,22	114:7 115:18	213:6,15,22,
groups	66:5,7,13,19	116:1 117:8	25 214:6,7,9
17:18 55:2	76:18 199:6,	142:1,2,6,10	215:22
grow	8,12	143:4,5	heavy
120:21 121:4	hand	154:22	8:13 119:22
growing	10:10 12:20	159:18	213:17
137:18	13:20 14:16	187:17	hebephiles
grown	handed	189:16 219:7	183:10
98:23 99:4,	5:25 7:4,15	harmfulness	214:19
16 100:23	9:5 30:9	189:7	height
101:18	45:15 175:7	Harris	140:22,24
grown-up	handing	42:10	held
150:15	5:17 7:3	Hayes	6:8
	9:11 168:13	26:7,11,14,	

helicopter 154:20	high 27:17 30:3	homophobic 46:1,10,12,	201:22
help 24:16 128:25	122:17	15 47:2	Houston 2:10 5:6,8
130:18	125:19	152:7	18:4 39:12
helpful 73:24	135:17	homosexual 70:6 76:19	hubbard 1:3,12,18
helping 117:2	138:10 185:6	77:1 90:23	2:3 3:4,14
hereto 1:24	higher 121:11	92:12 103:19	4:3 5:9,10,
Herman 52:15,17,19	186:24	homosexuality 4:7 77:22	13 62:6,18
53:20,21,23	highest 143:1	78:21 197:8	97:1 173:25
54:1	highlighted 62:2 172:17	homosexuals 77:13	177:1,6,7
hetero 101:24	highly 109:13	honestly 79:7	178:16
heteronormati ve 153:3	202:17	honors 211:24	205:18
heterosexual 70:3,5 71:18	hire 171:11	hook-up 107:11	206:2,8,16,
72:2,3 74:19	hired 170:22	135:22	23 207:5
75:19,22,24	historian 84:5	hooking 136:4	208:7,19
76:1,5,8	historical 53:8 88:2	Hoover 2:9	213:6 214:6,
78:6 87:2	111:16 114:3	hope 158:4	21
95:12,18	138:16,18	hoping 207:6,9,16	Hubbard's 3:22 178:20
101:22	139:10	hormonal 119:22	huge 15:7
102:17,18,25	141:12	horny 190:11,17,22	human 16:12 34:4,
103:9,15,17	183:15 218:3	horrible 56:20	20 39:6
136:12,13	history 39:8 55:8	hostile 88:20	57:10 139:23
137:13,20,22	68:14 84:6,	hostility 93:21	humans 130:8
138:2	11 128:23	hotline 31:17	humble 128:19
153:13,20	181:25 220:1	hours 218:11	hundred 15:8
154:4 159:6	hitting 219:15	house 32:14 63:10	hunt 80:18
182:11,20	hold 106:7 198:5	121:7 199:22	hurt 109:23
heterosexuali ty 153:9,16	Hollie 51:5 164:16	200:13	110:15
Hey 105:8	202:11		hurting 117:24
hidden 25:22	Holocaust 56:14,16		
hide 14:16	home 59:6		I
hiding 56:15,20	homogenized 90:25 91:18		idea 10:24 20:21

127:4	imperfect	includes	204:10
128:10,20	39:7	40:10 55:7	indication
129:8,11,16,	implicit	195:7	5:20,22
17 157:24	12:5 17:10	including	individual
158:1 186:12	48:8	22:9 58:5	119:13,21
202:18	implies	70:20 71:7	207:20,21
ideal	217:14	73:20 80:13	individuals
111:1	implying	84:20 98:12	55:5,21
ideas	33:7,12,21	138:22	119:11 198:1
45:1,3,21	34:8,24	150:17	203:8 204:1
46:2	important	153:15 177:8	207:6,9,15
identificatio	14:23 41:4,7	203:10	215:3,12,14,
n	178:15	207:24	21
103:15	imposing	incompatible	inequality
identified	136:2	67:6 112:6	68:16
91:8	impression	114:22	inexperience
identify	44:13,19	inconceivable	141:4
102:5 189:24	45:11,13	14:12	inexperienced
identity	57:1 59:14	inconsistent	149:9
54:4 73:25	62:25 104:11	111:15	infamous
101:4 119:17	146:7	incontinence	56:4 80:23
120:9 121:6	imprison	85:18	infer
III	219:9	incorporated	63:12
135:5 144:13	improper	58:13	inference
145:1 147:9,	146:22	incorporating	150:21,23
25 209:14	147:1,7	144:5	inferences
ill-informed	inaccurate	incorrect	63:6 173:14
131:4 149:9	169:18 199:1	12:2 141:19	inferred
illegal	inappropriate	219:24	79:9
82:17 143:5	82:15,17	increasingly	inferring
illicit	incarcerated	119:15	92:25
209:3,9	73:16,19	incremental	inflict
Illinois	incest	171:8	42:24 43:1,5
172:2	76:14 125:3,	indeed	influence
illumination	5,21 126:8	10:25 48:25	87:14
50:5	incident	193:18 205:3	influenced
image	22:4 35:14	independence	18:22
83:18	199:22	153:6 154:7	influential
immature	incidental	independent	47:15
131:4,16	191:14	154:11	information
immediate	include	INDEX	28:9 36:3
125:15	70:14 124:18	3:1	71:15 162:3
immunity	185:8	indicate	168:15
163:11	included	30:6 33:2	175:22
impaired	70:11 71:10	36:14 212:20	191:20,24,25
157:10	76:6 123:6,8	indicated	200:12
	144:10	45:19 181:6	201:14 203:1

204:11	insubstantial	intergenerati	involve
inherent	108:3	onal	50:18 150:13
74:16	intellect	82:13	217:15
inherently	153:5 154:6	internet	involved
72:13 113:25	intellectual	17:17 72:19	56:11 65:13
114:7	77:2 159:8	173:7 175:1,	72:6 73:21
initial	intellectuals	8	81:25 94:1,
198:25	77:13 89:14,	intersection	5,22 105:12
201:18	19 92:20	9:2	185:5 200:13
initially	93:7,20	Intersections	204:5
23:7 210:19,	129:4	4:4	involvement
21	intelligent	intervene	19:5 154:21
initials	176:3	177:24	200:2,8,10
189:25	intended	interview	201:3
initiate	100:8 194:8,	49:2,23	involves
107:7	10	50:12 189:21	50:19
initiated	intensified	interviewed	irresponsible
71:12 75:3	119:23	189:20	53:9
191:19	interact	interviewing	Irvine
193:12	30:20	50:16	124:10
initiative	interaction	intimacy	isolated
81:9,13	8:8 13:17	104:3 120:23	91:3,23
insensitive	117:10	intimate	92:21
143:20	120:18	40:4 130:24	isolation
insert	interactions	introduction	56:19
152:3	23:6 54:13	3:18 4:10	Israeli
insisting	153:17,18	178:22	204:22
193:13	interdiscipli	181:24	issue
instance	nary	188:20,22	3:18 57:7
1:20	84:7	189:4 197:19	58:6,7 99:24
insti	interest	introductory	128:3 134:21
97:8	159:14	190:4	178:15
institute	219:21	intruded	182:11
27:15 133:7	interested	186:24	188:12 214:8
institution	19:4 56:12	investigate	issued
89:1 97:8	57:7 58:7	177:5	35:22 45:15
institutional	208:14	invitation	issues
67:11	interesting	175:10	58:5 68:9
instruct	157:13,24	invite	94:13 140:22
124:4	interests	174:13	146:18
instructing	32:1	invited	158:17
201:3	interfemoral	98:6 174:17	165:18
instructions	79:11	inviting	Italy
192:17	interference	171:20	69:16 115:9
instrument	36:1	invoked	Ivan
97:25	interfering	211:16	192:1
	36:5		

J	21:1,5	164:14,23	Judith
	23:11,15,18,	165:2,4,13	124:9
Janet	21 24:2,4	170:8 172:6,	June
	25:1 28:23	9,11,16,21	173:3,7
23:8 25:18,	29:2 30:5,24	173:17	jurisdiction
	31:7,11	175:25 176:5	60:24 118:16
22 29:9	33:17 34:3	178:6 180:9,	jurisdictions
31:18 35:13	35:9,11	20 181:21	118:18
Janice	36:10,12	184:2,16,21	jury
124:10	37:7,11,24	185:7,12,17,	1:5 26:24
January	38:8,14,21	22 186:4	justice
172:22	39:2 40:14	187:9,25	94:13
jarring	41:4,13	188:6 189:17	justify
22:4	43:3,14	190:24	44:19
Jeff	44:18,24	191:6,8,16	juvenile
201:10	46:20 47:11,	193:8	192:21
Jennifer	13 48:18	194:17,24	
1:21 5:4	49:6,11,23	195:3,19	K
Joe	50:1,10,12,	196:2,11	
23:25 156:3	21 51:14	197:5 199:16	
205:14	56:5 58:11	200:20	K.J.
John	61:14,18	201:6,11	189:25
1:6 21:19,21	62:1,4,6,15	202:5,23	Karachi
22:1 49:14	63:18 64:10,	203:5	95:25
81:9 160:23	13 78:4	204:19,24	keep
Jordan	86:13 96:9,	205:12,14,17	5:14 25:2
80:18	11 105:19,21	206:7 207:4,	Kennedy
Joseph	106:19	13 211:11,20	173:18
2:4 65:10,	107:24	214:3,5,15,	174:1,25
12,16,20	113:13	20 216:17	212:19
163:15	118:11	217:22	Kennedy's
journal	120:10	218:15	175:13 176:6
134:18,21	123:21	219:3,19	202:16
158:14	134:24	220:13	Kenneth
journalists	135:1,23,25	judge	78:5
32:21	136:14,16	37:13 63:23	kept
Joycelyn	138:12,14	175:17	193:13
124:17	139:18	193:17,20	Kevin
Jr	140:3,8	judged	98:12,13
2:9 3:5 5:13	141:14	171:10	kick
6:14,18,19	147:5,15	judges	121:6
11:14,16,18,	148:24 149:1	80:14	kids
22 12:1,7	152:12,24	Judging	80:22 119:16
15:15,19	153:1 155:22	207:17	123:18
16:14 17:3,7	156:3,6,7	judgment	125:8,12
18:16 19:7,	159:20,24	75:2 141:5,	131:22,23
12,22 20:12,	160:2,9	9,17 143:8,	153:14,15
16,21,23	162:9,10,14,	10	
	16 163:6		

30

U.S. LEGAL SUPPORT, INC
713-653-7100

lead 54:10	led 46:13 145:18 199:7	LGBTQERS 168:21	link 201:21
leaders 93:25	left 5:16 14:5 125:14 147:23 187:2	liable 169:20 174:3	linking 143:17
leading 150:14	legal 2:16 5:7 36:1 53:24 60:10,15,18 61:4,5 69:15 92:6 118:15, 17 132:11 135:9 136:1 139:6 143:5 163:9 207:18 218:2	liaison 98:4	list 160:15 203:8 204:1 210:14,19, 21,23 215:3, 11,13
lean 21:4		libelous 7:18,24 11:6,11 12:6,11 162:21 173:15	listed 174:15 203:25 204:6 212:5
learn 3:17 50:6 66:13 96:12 117:15,17 118:7 127:13,22 128:10,11 129:17 131:2,6,7,8 132:5 194:14,18,22 197:14,16	legally 92:18	liberal 67:21 84:7 122:2,10	listen 194:16
learned 16:20 55:1 60:23 66:9 112:14 116:23 117:10 120:18 121:8 210:21	legislatures 144:5	Libertarian 69:11 139:20	listened 48:22
learning 143:22 144:10,14, 17,20 145:2, 4,11,13,25 146:9,22 147:1,6,10, 14,19,20 184:23 194:19 208:14,20,22 209:12,16	legitimate 46:3 189:11	license 140:1,3,9, 16,21	listening 48:22 50:8
learns 127:15 131:14	legitimize 60:6	life 56:23 74:1 83:11 117:4 123:15,17 137:24 154:22	listing 211:6,22
leave 15:4,10	legitimizing 143:19	light 8:15 11:23 213:17	Listserv 36:6,7
leaving 164:3	lesbians 81:2 83:18	likelihood 118:3 141:2	literal 32:19
	letter 3:21 4:3 28:3 162:17, 22 163:14 170:13 177:13,24 179:17	likeness 26:13	literary 77:3,13 112:25
	letting 20:9 180:10	likes 33:9	literature 84:9
	level 37:22 48:1 49:3	limit 197:25	litigation 64:11
	Levine 124:10	limiting 137:9	little 21:2 49:18 73:11 74:2 87:5 109:15 111:20 113:8 123:14,15, 16,18 171:4 205:6
	LGBTQ 168:20	Lincoln 68:11	Liv 4:9 179:5
		line 188:18	lives 83:13 133:8
		lines 122:6,8	located 5:7
		linger 138:23	

long 52:19 57:24 64:17 82:7, 10 132:11 143:4 205:19 206:3,9 209:13	losing 171:24	low 6:17	mainstream 91:21 94:8 168:24
long-term 94:2,5 109:16 111:21 113:8	lost 56:16 180:11	lower 69:21 115:12 159:2	maintains 56:10
longer 85:4 107:21 110:7 139:16 161:4 178:13 181:14 198:5	lot 22:13 54:2 57:5 60:18 74:2 94:8 95:8 100:5,7 107:23 114:14 117:5 124:8 126:4 139:15 154:25 166:6 204:10 218:23 219:22,23	lowest 86:18,22 87:18,20 88:5	major 38:2 171:19
look 23:24 24:4 25:1,3 36:12 39:15 51:1 54:14 63:21 68:9 101:2 111:24 141:11 144:13 145:18 147:25 154:22 155:22 166:2 172:11 205:1 209:19	lots 95:4	Ly 103:25	majority 75:10,23 138:5 142:8 189:15
looked 19:1 35:4 59:18 60:12 74:6 101:7 134:21 163:4 181:8 187:13 188:7	love 4:6 60:6 62:13,18 66:25 76:17 77:9 84:22 86:24 87:1, 18 88:18 89:15 90:6, 9,10,12,13, 15,22 91:16 92:11,21 97:24 111:1 122:21 151:20,25 152:17 153:11 154:10 177:3 178:20 207:15 208:16 213:7 214:22	Lysias 103:25 104:9,13	make 14:16 22:18 51:4,7 123:9 124:9 146:19 167:21 168:2 173:14 198:20,23 212:12
looking 29:5 62:7 94:12 103:6 151:16 166:3,13 205:15	loved 78:15,18	Lysias' 104:1,2	makes 40:7 123:10 161:2 180:24 184:8
looks 25:6 29:19 30:2 32:4 40:9 41:19	lover 78:14 97:13	Lysias's 103:25	making 8:18 27:2,5, 11 28:18 50:8 73:25 104:14 150:21,23 151:1 182:23 200:10
	lovers 112:18	M	male 3:17 16:12 18:11 45:4 47:5 72:4, 12,15,21 74:20 76:3,4 85:21,22 96:12 101:20 102:19 103:10 105:25 114:8 115:7 135:11 136:6 146:25 216:3,12 217:17
	loving 184:11	machine 1:22	males 13:3 17:14
		made 14:4 34:19, 23 37:15 43:10 53:1,5 60:1 78:21 92:20 93:7, 23 120:8 160:14,16, 18,25 161:12 163:10 164:7,16,24 168:20 181:5 199:12 203:10,11 204:4 215:7	
		Mader 156:15,18 157:24	
		main 7:9 41:21 159:7	
		mainline 82:21,25 83:2,10	

82:4 108:9	217:10	marriages	Mccarthy
109:2 130:25	manipulative	83:19 87:2,3	49:15
135:10,16,20	71:1,3 72:25	marry	Mccarthy-ism
136:2,4,19	75:2 106:14	97:18,19	214:2
137:10	manner	masculinity	Mccarthyite
154:15 188:9	48:18	86:2	47:17
218:5	manpower	mass	Mcmartin
man	220:3	33:3,12,22	80:10
17:1 52:15,	MAP	34:4	Mcraven
20 64:7	183:3	massacre	28:9
66:25 70:24	MAPS	43:11	mean
85:14 86:3,	183:2	masturbation	15:3 21:13
4,5,8,9	margin	124:14,18	22:7 23:19
91:19 92:3	70:19 91:21	material	25:5 27:4
93:15 98:5	marginalizati	37:5 166:4	28:3 31:10,
105:12	on	200:16	21 32:8
107:22	3:13 93:8	materials	33:18 35:5,
111:19 113:7	marginalize	59:18	12 43:21
117:2,14,16	82:22	mating	47:6 48:17,
121:10	marginalized	130:14	19 49:12,13,
129:18	90:24 91:9,	matriarchy	14 50:5
144:3,9	17,20 116:20	152:21	51:13,15
151:20	Mariah	matrix	55:17 57:10,
164:5,10	4:9	89:14,20,22,	11,23 58:13
177:2 203:20	mark	25 90:1,5	60:14,22,25
207:14	63:15 159:20	matter	61:2 67:22
208:15 213:7	162:11	14:23 15:12	68:9,11,16
214:22	164:21	26:12 83:13	70:11 73:12,
218:16	marked	100:9 141:25	17,18 75:7,
man-boy	23:10 24:25	150:10	23 76:9,10,
91:16	61:23 63:17	152:21	15 77:4
man/boy	96:10 155:21	163:21	78:5,12,19
84:22 90:22	159:22	165:10	79:7,12
92:11,21	162:15	203:22,24	80:4,5,17
management	164:22	213:16	81:1 84:20
203:9	165:12 170:7	matters	86:2 88:22
manipulate	172:10 178:5	31:22 131:13	89:21 90:7,
92:16 106:8	180:19	mature	10,13 91:13,
153:2,9,20	181:20 195:2	30:14 118:1	25 92:15
176:16	211:10	127:23	94:23 96:17
manipulated	Marquardt	131:15	98:10,14
71:5 72:3	1:21 5:4	may've	99:25 100:6
80:20	marriage	70:11 101:18	101:2,5
manipulating	78:23 94:9	116:5	103:6 107:20
81:23	112:18	Mayer	114:5 116:2,
manipulation	153:16 220:5	3:15 63:19	21 117:17,23
72:5 82:11			118:2,3,25
132:11			120:13

May 25, 2021

34

121:4,15	22:13,17,18,	64:16	193:2,12
124:9 125:4	21,24 28:3	196:20,24	194:18
126:21 128:6	35:4,20	197:3,19	208:19
131:18,22	51:17 80:11,	memories	209:11,16
133:20	24 168:16	73:13 98:24	mental
134:12	205:5	99:5,18	92:9 115:10,
136:10	medical	100:24	11,13 154:23
142:10,11,24	99:12	101:19	157:15,17
144:4	meet	memory	mention
145:19,23	52:22 53:15	10:18 73:8	85:14 122:20
147:20	55:9 98:7	100:12,13	mentioned
150:21	meeting	134:14 163:4	83:2 92:8
152:20	49:19 50:18	192:21	102:2 162:22
155:11	55:1 57:15	men	mentorship
168:23	65:15,18	16:2 46:24	115:17
178:12 180:4	198:4	67:24 69:5,	126:15,23
185:13,18,25	meetings	14 70:6	127:8,19
194:14	52:23 55:9,	71:5,21	128:9 129:7,
199:15 205:7	11,16 59:5,	73:7,15,23	10
208:3 213:2,	7,8,9 65:8,	78:22 85:7	mere
19,22,23,25	11 198:6	86:2 87:14	211:3
215:24,25	Melzer	92:15 94:14,	message
216:5,8	52:17 53:19,	16,19 95:10,	84:21
220:7	23,24,25	12,16,17,18	messages
meaning	56:6,9,13	97:18 98:12,	200:18,20
41:10 51:17	57:4 58:17	23 99:4,16	met
78:14 91:20	59:11 64:3,	100:23	49:9,12
98:2 117:14	5,11,23	101:12,18	53:18 64:18
145:20	65:1,4	103:1 106:14	65:11 72:18
meanings	197:18	107:3,24	78:5,6 133:6
145:19	207:25	109:19	146:14,15,16
means	member	112:15,17	meta
5:6 37:25	18:3 54:15,	113:1 121:13	70:12
48:22 50:8	17,19 65:1,4	126:12	metaphor
78:13 122:21	129:6 133:24	132:5,6,17	86:25
128:21	196:17,22	137:22	methodology
144:12	197:22 202:9	142:1,5	74:17
145:20,24	207:19	144:18 146:8	methods
146:7 166:20	213:25	148:8,21	84:12
185:3 213:20	members	149:5 150:11	182:13,15
215:22	26:23 40:3	151:10,11	Michael
meant	49:12 63:25	164:8 169:1	95:25
45:24 51:8	98:7,19	177:4 182:10	microphone
131:17	111:2 194:10	184:12	180:11
145:25 146:2	207:9,18	189:19	middle
147:11	213:23	190:7,25	83:10,18,19
media	membership	191:6,11	138:25
3:23 19:13	54:9 63:2	192:2,7,20	

205:15	misbehavior	14 99:11	mortality
might've	64:15	108:23	97:20
9:20 10:18	misinterpret	110:18	mother
63:3	147:12	111:23	152:22
mike	misplaced	112:9,12,13	motivated
180:3	23:24	113:22	202:2
Miller	misrepresent	115:2,7,8	motivation
211:14	107:19	187:23 188:4	41:9
million	176:17	206:18	motives
27:15	misrepresenti	modified	50:5 194:15
mind	ng	203:16	motus
16:22,24	46:2	modify	46:3
30:11 31:23	missing	145:9	mouth
33:11 45:2	25:15 121:17	molest	79:15
49:6 114:9	mission	40:13	move
178:3	59:16,21	molestation	31:11 76:20
mine	60:5	48:12 92:4	movement
8:6 41:12,20	mistake	molested	77:2 83:8
170:11	56:3	76:10 80:21	91:6 200:4
Minnesota	misunderstand	molesters	moving
80:18,19	ings	40:1 72:8	31:14 79:19
minor	30:16	91:4,12,24	MSW
13:2 54:13	misuse	92:1,14	116:23
55:21 64:21	159:1 205:22	molesting	mul
158:24 217:8	misused	80:16 81:3	124:13
218:24	184:17	Monday	multiple
minor-	misuses	43:17	87:20 134:14
attracted	184:15	money	multiplying
183:5,18,24	misusing	107:25	124:5,14
184:5	190:20	161:5,7,19	muse
214:14,16,23	mix	170:17	109:22
Minor-	124:22	monkeys	mushroom
attractive	mob	130:1	48:1
214:15	200:24	monogamous	mutual
minority	mobility	94:2,5	90:16 124:5,
99:22	97:25	monthly	14
minors	model	133:22,23	mutuality
47:1 54:24	67:19 70:4	moral	87:8
159:4 178:14	108:23	80:8	mutually
189:8,10	109:1,6,19	mores	71:13,24
191:1	112:8 197:16	78:9	75:2 142:5
minute	models	morning	myth
13:16 220:23	120:24	6:21 10:12	16:4 85:3,8,
minutes	137:15,17	11:1 161:13,	11 92:21,23
6:25 10:1,6,	138:7	18	95:16
11 195:20	modern	mortal	110:22,23
218:12	77:20 91:9,	16:11	

mythologies	name	151:10	73:5 74:18
6:5	5:3 36:4	185:16,17	79:15 116:17
Mythology	53:18,19,22,	191:18	156:20
6:6,7 14:21	24 64:7	208:10 219:4	165:20,21
209:22	174:21,24	necessary	172:4 174:4
myths	175:2 198:11	90:15	178:3
14:20 16:10	200:18	need	196:17,20
	202:15,21,24	6:14 20:1,6	202:3,13
	203:7,21	43:19 51:1	210:20
N	204:16,19,	121:25 128:1	218:17
	21,22	129:21	Newman
naive	named	155:19 163:3	160:18,20
138:22	52:15 163:15	181:9	News
147:12	201:24	209:18,21	161:13,18
152:14	names	218:14 219:8	nightclub
190:22	68:10	needed	43:12
NAMBA	narrative	67:9	nip
207:8	190:10	needs	47:14 51:11
NAMBLA	narratives	88:1 138:1	nipped
13:14 51:20,	191:12,13,22	154:10 163:2	47:23
25 52:13,20	192:24	182:11,20,22	no-nothing
53:3,13	Nash	190:15	116:21
54:9,15,17,	207:14	negative	nom
19 55:4,20	National	70:19 75:17	198:9
56:10 59:12,	207:13	82:19 91:2	non-bisexual
15,17 60:5	natural	101:15,25	159:4
62:22,24	135:11	103:18 116:7	non-gay
63:3,12,22,	nature	166:6 178:11	159:4
24 65:21	15:22 76:12	neglect	noncoercive
66:3,8,14,	113:25	152:6	70:17 100:14
20,24 67:8	122:16	nervous	132:21
84:21 94:17,	124:16	30:8,10 35:7	nonconsensual
23,24 95:2,	179:12	45:16 168:21	217:8,17,21,
4,9 133:25	192:12	network	23
134:4 177:2	nauseating	63:24	nonconsent
178:21	173:1	neurotic	112:23
189:13	Nazi	44:7,8,10,	139:22
196:4,18	56:15	13,20	nonjudgmental
197:6,19	necessarily	neuroticism	192:8
198:3,4	60:9 67:7	45:2	nonresponsive
199:4,6,9,12	78:24 79:7	neutral	35:10 36:11
203:8,25	84:21 91:14	120:1	50:11 134:25
204:6 207:9,	92:3 94:22,	never	135:24
19 208:9	24 95:22	4:14 8:23	136:15,23
213:7 214:7	111:4 115:25	22:21 29:20	138:13
215:3,22,24	127:2 142:1	32:13 34:11	148:25 150:2
NAMBLA's	145:23	56:21 65:18	152:25
63:13 65:2,5			

155:3,9	212:24	86:10 106:16	obviously
214:4	numbered	107:16	14:1 30:6
nonsexual	1:20	113:10 118:9	95:4 178:15
93:14	numbers	119:12 120:7	occasionally
normal	16:6 96:20	123:19	196:10
157:16	102:25	134:24	occupied
175:25	numerous	135:23	56:15
normalized	136:10	136:14	occur
206:21	Numismatics	138:12 139:9	142:18 149:8
North	179:11	141:10	occurred
66:25 177:2		147:3,8	69:8 80:19
207:14		148:24	105:7
208:15 213:7	<hr/> O <hr/>	152:2,24	occurs
214:22		155:18 164:9	81:19
Northchase	O-E	172:5,7	Ochsner
5:8	144:22	173:12	24:11,12,13,
notation	oath	175:24 176:2	21 35:21
25:21 51:20	5:5	184:1,13,19	41:25 43:24
note	object	185:2,9,15,	47:18
4:14 128:1	14:15,19	19 186:2	OED
notice	15:11 86:18	187:8,16,20	145:1 146:2
161:23	111:2 191:5	188:5 189:12	147:9,25
162:4,11	objection	190:19	209:14
notion	11:10,16,20,	191:7,10	Oedipus
46:2	24 12:3	193:6 194:6,	85:16
Nouns	15:14,17	21,25 196:8	offender
145:10	17:2,4	199:14	65:25 165:18
November	18:12,25	200:15	182:3
6:1 24:9	19:9,19,24	201:5,7,25	offenders
25:7,9 29:10	20:3,4,6,11,	202:19 203:3	4:10 75:5,7,
35:7 39:10	13,15 28:21,	204:13	9,13,23
41:24 43:17,	25 30:1,21	207:1,11	181:25
22 44:1	31:3,9 33:15	214:4,10,18	182:10
166:1,14	34:2 35:1,9	216:14	189:22
nuclear	36:10 37:6,	217:19	192:10,17
83:11,13	9,21 38:6,	218:25	194:9,11,13
125:1,11	13,18,24	objectionable	offense
nudity	40:2,22	32:15	192:11 216:8
32:9	41:11 42:25	objections	offenses
number	43:8 44:11,	134:20	75:24 193:3,
15:7 16:10	21 46:17	objective	16
17:16 69:17	48:16,21	157:2	offensive
73:6,20 96:7	49:5,7,21,25	obsession	15:3 184:3
156:22	50:3,10,15,	87:19	offer
162:12	25 51:12	obvious	60:21 64:23
179:14 182:9	55:22 58:4	54:3,5,21	124:23 153:4
186:9 196:13	61:14 64:6,	131:11,13	210:4
	12 78:2		

offered	98:22 102:2	128:9,12	145:15,17
6:20 210:2	107:6,9	129:7,18	148:14
212:5	108:7 118:21	130:6,18	149:11 150:5
offering	121:23 122:9	132:6,19	151:13
81:23 83:9,	124:19	136:13	154:19
11 192:17	125:25 127:7	143:23 144:3	156:14
office	128:8 129:25	159:17	160:18
5:7 21:15,	130:4 132:3	olds	161:17 165:7
16,25 22:12	133:24	114:10	166:1
36:1 163:9	134:11	once	170:11,12
170:2	135:25	59:5 105:12	173:13 177:8
offices	141:20	133:17	178:12,13
1:19	145:22	143:14	182:4 189:6
offline	146:25 147:5	180:24	192:16
172:24 173:2	149:7,13	191:17	194:12,18
oftentimes	155:8 157:1	210:23	199:21 200:3
107:14	158:3 163:6,	213:24	204:2,3
Ohio	8,14 164:14	one	205:10,15
173:19	166:22	7:2,4 12:20	209:23,25
okay	167:15	13:8,12,20	211:13
5:3,16 6:18	169:7,14	17:23 18:7	212:2,4,21
8:25 13:15	171:6 172:9	23:22 24:16	216:23 220:7
14:10 16:5,	177:21	26:10 29:25	one's
14 20:7	181:16	32:1,14,20	87:23
21:3,25	182:25 183:9	33:5 34:12	145:21,25
23:11 24:4,6	184:21	36:25 37:12	one-on-one
25:14 29:4,6	188:19,25	40:9,10,11,	117:10
32:23 35:11,	193:17 195:3	25 43:21	120:18
19 36:10	203:5 205:7	50:6 51:18	ones
39:16 41:22	206:1 207:4,	52:15,16	54:20 136:6
42:1,18,20	13 209:7,15	54:10 55:1	191:18
43:16,25	210:13 211:5	56:3 60:14	193:11
44:2 46:6	212:19,25	72:8 74:5	ongoing
47:11,22	213:9	75:3 78:15,	21:11
53:4,25	214:20,21	18,19,20	online
57:14,21	215:2 219:3	79:10 87:20	138:6 163:20
59:3 61:10,	220:11,18,22	96:3 97:3	165:3
20 63:21	older	98:17 99:3	172:20,22,25
66:24 67:1	78:18 79:10	100:17 101:5	173:2
68:25 69:7,	86:8 97:14	111:13	open
23 74:11	98:5 106:8,	115:24 120:5	54:20 166:16
76:17,23	9,14 107:3,	121:20,21,22	167:3,7,17,
77:17 82:12,	24 116:6	122:23 126:2	19,20,22
18 83:5,22	117:11,16,18	127:13,15	168:4 170:5
84:17 85:6	118:8	128:10,11	opened
89:5,6,10,18	120:18,24	130:7 131:2,	148:5
90:4 93:23	121:10	6,13 139:15	openly
96:4,6,25	126:15,23	141:7,15	81:10
	127:19,22		

operandi 46:3	ordinarily 72:18	outcomes 70:19	24 97:23 103:21
operate 58:14 192:17 194:13	organization 52:1,8,11 53:14 54:3 56:4 59:15 64:16 65:14 66:8,19 82:21 83:1	outfit 76:18 160:21	108:16 115:1 121:23,24 126:21 132:14 138:15,24,25 139:1 141:20,22 143:16 148:2 151:15
operating 52:7		outlets 55:3 148:6	156:15 158:3 161:3 165:25 166:13 168:17 173:3 182:4 188:15,21, 23,24 189:18 190:6 195:9, 10 203:25 204:6,7 205:1,2 211:11,12 212:24 215:4
operation 66:14	organizations 94:9,22 168:24 208:3	Outloud 198:13	
operations 60:21	organizer's 41:20	outside 125:15 129:1	
operator 180:18	organizing 200:2,8 201:3	outstanding 178:23	
opinion 17:16 88:1 89:8 99:12 104:13,17,18 113:5,13 160:21 213:16	orientation 27:9 40:12, 15 53:6,10, 11 75:1,22 103:18 152:9	overrepresent ed 27:24	
opinions 193:24	orientations 52:4 54:24	overwhelmingl y 72:9	
opportunity 26:24 118:14 149:4 190:11,23 191:4	oriented 67:23 69:2,4 101:2 111:6	ownership 34:6	
oppose 47:1	origin 139:10	Oxford 144:13	
opposed 83:5 101:14 138:10	original 4:11 78:20 145:19 195:6 220:8	<hr/> P <hr/>	pages 23:20 25:12, 15 28:4 43:19 205:15
opposes 47:4	originally 157:9	P.C. 1:19	
opposite 130:9	origins 83:8 91:6	p.m. 1:21 25:7 41:24 43:24 61:22 160:6 195:24	painting 79:9 95:25
opposition 81:12	Orion 97:3	page 3:2,5,10 4:2 19:1 25:5,6, 11 29:4,6, 15,18 31:25 36:13 41:18, 22 43:19,22 62:16 63:21, 23 65:1 67:4,10 76:21,22 77:17,20 84:25 86:13 89:17 96:19, 20,21,22,23,	paints 11:23 paired 105:14 panic 80:8 93:10 151:19 152:16 paper 176:8 194:8 paragraph 47:13 76:24 79:20 88:25 89:16 103:23 109:10 122:7 124:25 139:1 151:16 182:5 190:5,6
options 124:4 153:16	Orlando 43:12		
oral 1:11,18 5:9 124:15	Oscar 77:7		
order 1:23 24:5 161:23	out-of- control 80:19		

paragraph's	155:13	151:4,6	187:4
36:15	165:7,8	passed	pederasts
paragraphs	169:21	151:7	53:10 55:1
36:14	174:12	passionate	93:14,24
paren	188:22 205:4	104:3	183:9,13,17
152:16	209:6 212:17	passive	pederasty
parent	participant	78:14	3:13 53:7
152:1,7	176:12	past	67:10 68:23
153:4	participate	68:2,6,7,8,	75:19 76:4
parental	55:18,20	19,22 108:6	77:21 79:25
151:18	participated	155:24	82:20 84:13,
152:16	54:2	patriarchy	18 87:2,6
154:10	participation	152:21	88:18,24
parentheses	196:3,6	Patricia	89:1 91:8
183:4	participle	200:18	93:8,15
parenting	78:14	201:24	97:4,7
154:20 155:1	particular	Patrick	110:10 112:6
parents	14:22 104:8	16:22 18:14	121:13
80:16,21	165:7 194:7	39:20 43:10	158:16
104:25	parties	46:12,15	173:11
107:19	98:7 185:5	Patrick's	183:24
125:7,12,15,	partner	41:21	187:7,15
24 126:5	75:15 79:2,3	pause	205:18
152:4,5	81:22 97:14	189:17	206:3,9,16,
153:2,8,13,	109:16	pay	18,24 218:20
19,24 154:1	111:21	43:16 97:23	pederasty's
192:18	113:2,8	161:5,18	67:6
194:13	117:18	peak	pedophile
parents'	121:18	118:3	54:11,20
18:22 154:5	127:23	pedagogical	152:17
park	132:19	126:14,22	153:11
72:19	149:11	127:8,25	183:5,7,23
part	partners	128:9 129:6,	213:8 214:8,
14:23 16:9	79:17 135:13	9	13
19:2 40:7	136:12,13	pedagogy	pedophiles
47:25 52:23	143:23 149:9	129:12	46:24 48:6,
56:18 63:3	party	pederast	10,14 49:2,
80:14 81:12	39:22 42:17	12:23 153:11	4,18 50:13
84:18 99:2	49:13,14	183:14	54:7,25
103:12	98:12,15	pederastic	78:25 81:7
108:12	143:9 162:4	15:13 16:2	95:6 183:9,
110:4,5	213:24 214:1	52:3 74:19	10 214:19
117:18	Pass	85:1 88:16	pedophilia
124:20	220:12	97:24 98:4	12:18,24
125:18	passage	109:1 110:14	13:5,19
129:20	98:25 104:8,	111:19	151:19,24
138:24 139:1	10 150:13,24	115:17 132:8	152:16
143:25			169:1,5

179:15,21	56:19 60:2,	Percy	personally
184:6	11,13 63:11	58:2,3 59:7	50:18 53:12
190:17,21	68:11,13	71:9 165:23	120:11
200:4	69:12 73:12,	Perfect	173:23
205:19,23	19,21 74:3,	38:21 130:22	179:19
218:16,18,20	15 75:6,12,	perfected	personnel
pedophilic	21 77:15	117:22	166:2,3
52:3	79:8 80:6	perform	persons
peer	83:14 95:4,8	118:6	183:5,18,25
142:15	96:2 102:24	performing	184:5 186:3
peers	108:12 111:3	127:16	214:16,24
135:18	115:15	period	216:22
pen	116:2,6,12,	13:18 21:6	perspective
177:13	24 123:10	57:24 78:9	32:12 53:8
penalties	128:25	197:5 220:2	157:14
60:19	129:3,17	Peripatetic	158:20
pending	139:21	98:20 99:10	persuade
64:21	140:20	permutations	177:15
penetrated	141:18	173:2	persuading
98:23 99:4,	142:14 150:6	perpetuates	86:9 177:16
6,17 100:23	151:23	95:16	persuasion
101:20	152:14	persist	86:12
103:10	153:10	53:16	pertinent
penetrates	168:15	person	216:21
79:10	174:17	30:14,15	perusing
penetrating	175:10 176:3	32:10 45:5	146:6
79:2	179:16,19	47:1,4 57:3	pervasive
penetration	181:17,18	61:4 72:18	80:3 81:15
79:11,14,16	185:3,20,24	76:13,15	pervasively
120:17	194:15	81:22 122:22	68:15
124:15	196:11,15	151:24 152:1	perversion
people	204:12 208:5	160:20 170:2	92:4
8:13 10:17	210:18 212:6	178:3 185:24	pervert
17:18 18:21	213:20	186:1 214:14	91:3,24
19:1,17,20	214:16 218:5	personal	perverts
22:22 32:11	219:7,9	19:8 22:23	91:12,24
35:3 37:19	people's	38:5,9,10,	92:1,13,22
39:14,25	46:2 215:9	11,12,17,22	Peter
40:8,13	perceive	57:1 120:23	52:15,19
41:13 42:5,	40:23	126:10	53:18 56:13
8,9,21,23	percent	130:24	57:22 207:25
43:5,6,12	75:11,12	152:23	Ph.d.
49:12,15	101:11,14	176:17	1:12,18 2:3
50:7 51:16	102:3,5	personalities	3:4 5:10
52:3,7,13	percentage	55:3	Phaedrus
53:15 54:2,	116:2	personality	104:7,8
23 55:3,8	Perceptions	134:15	
	97:4		

Phd 1:3	pile 25:2	point 14:4 44:19	pornographic 32:9
phenomena 134:16 150:19	place 51:1 73:2 106:17 162:2	47:10 53:12, 13 61:17 84:13,25	pornography 32:2,5,7,18, 22 33:24
phenomenon 77:3 80:3 81:15 121:13 219:21	171:11 188:3 219:6,10	124:8 172:19 182:22,24 187:3,14,17, 22 197:14	60:20 75:25 138:6
Philadelphia 133:8,12	plague 220:4	200:23 215:19	portion 79:20
Philippines 61:2	plain 83:17	pointed 218:22	portrayal 82:19
Philological 177:19	Plaintiff 1:3 2:3	pointing 185:8,13 187:5,6	pose 108:21 112:10
philosophical 38:19	plan 210:4	points 16:15	114:25 115:3 128:15,17,25 135:1 148:3, 10 151:8
Philosophical ly 69:11	planned 211:24	poison 22:19	184:22
philosophy 38:1,3 39:8 40:25 88:22	plaque 97:21	poli 219:25	posing 29:17,24 30:3 32:17 33:24 132:2
phone 133:20	platform 165:7	police 104:25 107:19	position 45:6 56:1 64:21 72:17 83:22 99:14 119:10
phonetic 14:22	Plato 41:1 88:2, 17,20,22 89:13,19 90:10 91:5 93:16	political 16:20 39:11 41:5,9 134:20 205:3	124:11 129:6 132:5 135:19 140:12 171:24 172:1 186:16 207:5 208:8,10 217:16 218:17
photo 32:10	Plato's 77:10 88:2, 10 89:5,11 93:22,24 104:7	politicians 34:5	positions 63:13,14 171:20 203:12
photograph 33:24	pleasant 98:24 99:5, 17 100:12,24	politics 19:4 186:12, 13,24	positive 18:8 75:14 101:13 102:9 113:19 114:12,15 116:7 125:2, 20 126:7 127:11,12
phrase 11:25 36:15 146:9	please 6:11 62:8 160:1 220:23	polling 17:16	
phrases 51:7	pleasable 192:23 193:10	pop 189:17	
physical 86:17 87:14, 18 88:4,20 89:15 90:6, 12,13 143:22 152:6 208:19 209:11,15	pleasure 124:5,14	popular 97:4 190:9 200:3	
picture 29:14 32:2, 3,16	plume 198:9	population 102:20 103:9	
	poets 77:7	populations 67:18 142:14,21	

132:20	17,18 108:1,	preface	presents
158:4,11,17	8 111:10,11	78:7	83:17 86:17
187:15	powered	preferences	President
192:22	30:3	157:4	27:13 28:4
positively	powerful	preferred	Press
109:15	116:13	53:22	66:5,7,14,19
110:15	135:11	pregnancy	199:3,6,12
113:7,15	powerless	122:13,19	Presumably
114:11	107:15	123:5	11:2
possession	Powerpoint	prejudice	presume
4:14	10:3	46:24	60:21
possibility	practice	preoccupied	presumption
147:11	3:14 117:19	32:11	38:4
148:19	208:3	preparation	pretend
149:16 150:5	practicing	166:10	107:12
possible	138:7	prepubescent	pretending
47:24 70:13	practitioner	119:16	93:14 135:22
121:21 177:9	117:11 118:8	151:25	pretense
195:1 200:10	120:19	Presbyter	88:17
possibly	pray	18:1	pretext
37:1	207:6,10,16	Presbyterian	211:6,15,17
post	pre	18:1,3	pretexts
29:14 165:4	207:20	Presbyterians	211:3,13,20,
174:1 175:1	pre-crime	18:5	21
202:16	56:13 57:7	Preschool	pretty
posted	pre-	80:10	122:25 192:5
35:24 173:3	democratic	prescient	203:2
posters	110:8	68:17	prevent
7:3	pre-pederasty	prescribed	50:6 150:8
posting	68:7	148:17	preventative
163:19	pre-	prescription	56:13 57:7
postings	publication	119:15	prevented
19:13	198:22	present	143:21
posts	pre-textual	2:14 52:6	147:18
22:21,24	211:7	55:16 74:25	prevents
potentially	preachers	88:4 104:23	136:3 144:1
162:2	80:13	106:12	previous
pow	preceded	112:15 137:6	70:13 112:3
106:7	80:7	176:9 196:9	previously
power	precise	presentation	112:2 116:11
65:10,12,17,	176:16	19:3 55:17	primarily
20,24 67:11	precisely	presented	97:8 126:12
72:12,16,20	34:5	157:24 191:3	136:7
73:1 104:19,	precision	203:9	primary
22 105:4,10,	55:24	presentist	86:25 159:14
25 106:8,14,	predict	68:18	primate
23 107:2,14,	135:8		128:1 129:19

prime	123:21	219:3,19	problems
176:20	134:24	220:13	98:18 117:4
Princeton	135:1,23,25	print	Procedure
133:7	136:14,16	199:9	1:23
principal	138:12,14	prison	process
78:20	139:18	40:1,7 100:4	162:5 167:19
Pringle	140:3,8	102:23	processing
2:9 3:5 5:13	141:14	104:24 105:9	211:2
6:14,18,19	147:5,15	159:1 191:1	proclaim
11:14,16,18,	148:24 149:1	192:2,11,13	14:17
22 12:1,7	152:12,24	193:2,15	procure
15:15,19	153:1 155:22	prisoner	72:9
16:14 17:3,7	156:3,6,7	76:7	produce
18:16 19:7,	159:20,24	prisoners	31:5 161:22
12,22 20:12,	160:2,9	48:7,11	162:6
16,21,23	162:7,9,10,	50:19 71:8,	produced
21:1,5	14,16 163:6	16 74:4	1:18 27:15
23:11,15,18,	164:14,23	193:14	production
21 24:2,4	165:2,4,13	privileged	190:3
25:1 28:23	170:8 172:6,	120:20	productive
29:2 30:5,24	9,11,16,21	probabilities	87:25
31:7,11	173:17	37:13 39:4	Profedder
33:17 34:3	175:25 176:5	40:24	177:6
35:9,11	178:6 180:9,	probability	profession
36:10,12	20 181:21	37:15	170:24
37:7,11,24	184:2,16,21	probable	professional
38:8,14,21	185:7,12,17,	46:13,14	94:10
39:2 40:14	22 186:4	136:9	professions
41:4,13	187:9,25	probably	94:12
43:3,14	188:6 189:17	12:15 20:4	professor
44:18,24	190:24	21:24 24:2	24:5 160:10
46:20 47:11,	191:6,8,16	26:1 45:24	173:20
13 48:18	193:8	59:22 69:2	174:25
49:6,11,23	194:17,24	81:19 117:22	177:1,6
50:1,10,12,	195:3,19	118:7 126:3	179:10
21 51:14	196:2,11	149:13	180:22
56:5 58:11	197:5 199:16	152:19 154:2	186:17 196:2
61:14,18	200:20	156:11	profile
62:1,4,6,15	201:6,11	174:22	76:11
63:18 64:10,	202:5,23	197:11	program
13 78:4	203:5	207:23 212:3	75:8 105:16,
86:13 96:9,	204:19,24	problem	20 116:23
11 105:19,21	205:12,14,17	107:23 150:9	211:24
106:19	206:7 207:4,	166:3	progress
107:24	13 211:11,20	problematic	98:4
113:13	214:3,5,15,	120:3	progressive
118:11	20 216:17		18:8 122:17,
120:10	217:22		
	218:15		

25 139:14	proposing	Provost's	203:10
progressively	170:16	22:12	publication
90:25 91:18	proposition	pseudo	4:10 96:18
220:6	157:1	51:3	97:2 133:1
prohibition	prosecutable	pseudo-	156:12
139:2	61:6	evidence	173:8,17
projector	prosecute	47:16,21	175:5 178:2
20:25	169:8,12,20	48:3 50:22	181:24 182:1
prominent	prostitute	51:4,10	199:13
39:10 41:5	87:9	psychiatric	200:11,14
80:12	protect	177:14	201:4 204:18
promote	130:18	183:16	publications
60:5,9,15	136:17	psychiatry	36:23 60:11,
169:23	192:19	183:12	12,17,22
218:16,21	protected	psychological	61:12 63:1
promoted	27:10,12	69:25 76:11	69:25
89:14,20	29:3 36:2,4	84:8 99:24	175:16,19,20
177:4 218:18	protection	111:16	196:21
promoting	148:15	134:17	197:6,9,12,
91:14	protest	142:20	23 198:12
proper	177:24	177:14 218:4	204:15,21
123:3 140:14	200:21	psychological	207:17 208:9
143:21	201:21	ly	publicist
144:9,12,17,	proved	123:12 136:8	39:11 41:6
25 145:2,6,	19:2 93:9	psychologists	publish
14,15,20	proves	100:7 134:13	50:1,13
146:3,9	112:22	psychology	177:16 208:8
147:6,24	provide	100:6 134:17	published
148:15 150:8	121:14	183:12	13:14 63:12
184:23	157:21	puberty	76:18 96:17
194:19	191:24	82:2 97:10	101:6 110:21
208:20,22	provided	119:14,17,20	134:17 175:6
209:12,13,17	112:17 149:4	120:2 135:12	177:11
properly	191:21,25	148:18	178:21 199:2
92:18	providence	pubescent	201:23
144:12,14,19	91:23	98:25 99:8,	214:22
145:4 146:2,	province	18 100:25	publisher
3 147:10,14,	91:3 92:13,	101:20	176:10
16,19,20,22	22 95:17	public	177:25 178:1
184:6	provision	17:14,15	publishing
property	120:8	28:3 46:23	50:20 52:11
152:23	provisions	64:8 72:19	63:9,10
180:25	1:24 143:18	83:17 93:20	punished
prophylactic	161:23	94:1 123:23	16:13 53:17
150:8	provost	124:12	85:17 92:18
propose	23:5,9	179:18	punishing
100:17		194:10	135:10
			136:20

punishment 183:1	queer 118:25	74:23,25 75:4 76:11,	R
pupils 98:17,21	question 28:13,14,18,	16 78:8 115:22	
purchase 220:24	24 33:20 34:7,8 36:21	120:13 126:17	racist 68:15
purported 27:16	37:10 51:21 68:25 76:2	128:15,25 131:25 132:4	radical 4:7 83:9 220:3
purpose 67:5 88:21 158:13,15	84:10 100:21 108:21 109:18 110:9	148:12 155:16 156:2,14	radicalized 89:2
pursuant 1:22	111:23 112:3,10,20,	160:11 184:23	raise 31:20
pursued 143:12	21 114:25 115:3,17,19,	190:13,14 220:14	raised 12:20 13:20 31:16
pursuing 181:15	21 119:16 120:12	quick 23:24 47:10	raising 139:11
put 51:16 64:20 84:23 91:20,	126:25 127:4,18 128:7,8,17	quite 9:23 28:11 57:23 73:19,	rally 205:7
25 104:24 105:9 162:2 165:3 166:6 172:25 189:19 208:2	129:15,22 131:1,5 132:2 135:2 136:1,17 141:15 148:3,10,11	22 78:23 81:19 92:17 107:10 108:15 117:15,17 121:15	ran 35:21
puts 162:2	149:1,6,12 151:8 155:19	108:15 117:15,17 121:15	Randy 4:3 170:13
putting 63:4 158:25	162:8 163:7 167:5 185:13 187:10 188:3 189:18 190:16,25 191:9 192:9 200:7 201:6,	167:21 191:14 218:6,7 quote 51:6 67:17 80:2 91:24 116:8 144:9 175:14 208:20 209:4	rape 15:12 16:1 85:9,15,20, 21,22,24 86:7 118:4 148:21 150:5 184:9 200:5 209:23 211:18 215:24 216:9,10
Q		11 203:14 217:11	raped 98:13
qual 182:12	question's 119:9	quoted 25:21 66:17 208:21	rapes 16:12
qualitative 182:12,15	questioned 166:4	quotes 92:1	Raphael 96:1
quality 193:23	questioning 68:21 127:4 150:18	Quoting 215:9	raping 16:7,11
quantify 137:9	questions 10:7 13:12, 15 27:23 31:13 48:8		Raquel 137:19,21
quantitativeness 182:13			rare 81:19
Quantitive 182:15			
que 191:8			

rate	147:12 187:5	reasons	10:13 61:21,
27:17,24	193:17,20,21	8:14 54:3,5	25 77:16
115:11	194:5	56:4 100:17	109:12 114:3
132:19 159:2	readily	211:2,5,8	155:10,12,13
rated	120:23	212:4	160:4,8
102:9 134:18	148:16	Rebecca	162:24 163:2
143:1	150:12,13	173:18,25	195:22 196:1
rates	reading	175:12	220:16
115:12 219:8	41:23 61:11	202:16	recorded
rationality	79:20 113:4	rec	10:12,18
45:5	135:3 146:5	12:12	194:3
raw	188:18 206:6	recall	records
138:7	reads	9:8,9 15:20	166:16
reach	147:17	32:20 211:4	167:3,8,17,
18:24 39:2	193:21	212:22 213:2	19,20,22
202:6	ready	217:1,4	168:4 170:5
reached	5:14 10:3	receive	203:18
68:19 119:19	190:8	40:6 170:17	recovered
193:24	Reagan	received	134:14 172:4
reaches	81:12	10:4 22:12	redo
148:18	real	40:11 122:17	163:2
react	23:24 93:13,	129:1 200:17	reduced
100:16	24 111:8	receiving	220:5
reactions	116:22 141:9	79:3 119:22	refer
101:8	211:22	recess	63:11 178:22
read	realization	61:22 160:6	212:23
7:17 11:2	61:8	195:24	referen
36:17,19,23,	realize	recidivism	36:15
25 37:5,19	62:23 155:8	219:8	references
38:23 79:1,	realms	recidivously	36:16
25 84:8	140:19	159:2	referred
88:12,14	reanalyzed	recognize	170:3 178:10
103:24	70:12	7:2 80:17	183:23
104:1,10	reaping	154:10	referring
109:9,10	43:12	192:15 208:1	80:5 144:16
124:7 146:11	Reappraisal	recollection	refers
173:24,25	4:7	12:12	46:5 183:7
174:13,17	reason	recommended	209:1
175:11,16	14:13 16:18	24:19 124:17	reflecting
176:10,23,24	35:8 56:18	reconsidered	116:3
177:8 181:3	98:22 99:3,	62:14,19	reform
182:14 190:5	16 100:22	63:3 76:18	60:10 82:22
191:13,22	141:7,15,18	178:20	refresh
195:14 213:3	154:3 178:16	reconstruct	163:3
216:19,25	208:12	55:24	refuse
220:20	211:22	record	170:19
reader	212:18	1:24 5:2	218:15

May 25, 2021

48

refused	45:4 70:6,24	112:17	13 119:18
170:4	74:19 85:7	113:6,24	137:18
refusing	86:19,23	114:14,18	198:24
211:13	87:11 88:6,	116:3,4,25	199:23
refutate	21 92:5	130:6,9,10	remembered
172:19	102:11,18	132:9,18	73:10
refutation	107:2 108:9	143:19	remotely
172:19	109:1 127:9	159:17 177:4	1:15,18,22
203:10	130:24	208:19	5:5
refute	144:2,8,15,	209:11,16	removal
51:13,15,17	17 154:15	relative	203:23
regard	157:22	91:5	removed
48:13 95:19	169:19	relatives	161:1
115:1	182:20	194:11	rendered
Regarding	184:12 187:5	relay	120:2
1:23	relationship	159:16	repeal
Regents	62:22 71:6	relaying	60:1
27:14 28:10	72:4,6,7,11,	202:1	repeat
regime	20 82:10	relenting	6:11
135:9 136:1,	85:1 87:8	178:1	repeated
18	90:16 95:23	relevance	116:17
registered	102:19	111:8	repeatedly
65:24	104:19	relevant	219:5
regret	105:25	84:12 110:22	report
174:2 192:15	107:15,18,	128:6 174:15	22:6,7,9
regulate	20,21 108:10	religious	27:16 29:23
34:6 139:21	111:19	17:19,21	85:23
reinforced	121:3,9	18:6,19	reported
109:15,23	122:20	religiously	1:15,22
110:15	132:19	14:14	30:19
111:20	137:23 143:2	reluctant	reporter
113:7,15	146:20	85:23 135:17	1:21 4:14
rejected	152:10,14	rely	5:3 6:10,16
219:11,25	154:4	74:3,7,14	16:8 20:1,5,
relate	165:21,23	relying	8 62:11 96:8
90:3	173:11	10:17 73:8	105:17
related	191:15 192:7	176:7 205:4	140:2,4
160:22	199:17	remain	159:23,25
200:21	relationships	45:7	160:3 161:25
relating	67:24 70:1,	remains	162:13
26:3	16,18,20	171:16	180:6,13,16
relation	73:22,24	remember	197:2 204:17
106:24 138:2	87:3,15 92:2	5:24 8:5	206:5 211:19
206:19	94:2,6	9:1,22 10:16	219:14
relations	99:22,23	11:21 22:2	220:18,20,22
15:13 16:2	107:4,8	28:13 41:17	Reporter's
17:15 35:20	109:14,22	116:8,9,12,	3:6 4:14
	110:14 111:4		

reporting	169:16,17,23	response	162:11,17,22
5:5	174:13 202:6	3:22 4:5	163:10,12,14
represent	205:4	7:25 8:4,5,	164:16
26:11,14	researchers	22 10:10	retractions
representatio	50:9	24:17 28:5	160:12,15
n	researching	35:16 42:14	retrospect
11:13	59:19	47:25 66:16	147:13
representatio	Reserve	71:23 111:24	retrospective
ns	220:14	112:2 164:23	ly
79:17	residence	169:25	99:25
represented	61:5	173:16 174:9	return
79:15,16	resist	178:7 179:3,	112:13
165:19	203:23	6 210:3	returning
representing	resistance	responses	114:24
5:6	211:23	210:8	reveal
represents	resisted	responsible	182:9
26:20	81:6 85:10	44:15 181:19	revealed
reproduction	193:12	rest	201:10
88:21	resists	19:6 123:1	revealing
republican	167:20	restroom	36:2 202:25
19:4 39:11,	reso	72:22 159:25	reverend
22 41:5	148:19	result	156:16,17
42:17 205:3	resolution	8:15 82:8	reverse
reputation	64:22	resulted	24:5
28:2 171:3	resources	171:23	review
172:3	159:1	results	22:16 23:19
request	respect	50:20 187:15	178:9,11
166:17	174:23	retain	179:1 181:23
167:3,8,17	175:13	55:25	198:15,20
168:4 170:6	respectable	retali	reviewed
203:17	83:10	28:15	22:21 181:12
requested	respected	retaliating	reviewing
166:2	120:24 220:6	28:7	27:18
169:12,25	respective	retaliation	rewards
requests	87:8	27:9 28:16	81:24
167:20	respects	retired	rhetorical
reread	118:2 129:11	156:25	132:2,4
162:23	respond	retirement	148:11
212:22	137:7	170:17	Rich
research	responded	retract	101:9 102:15
27:21 34:18	7:20 8:23	160:14	132:24
36:16 40:7	respondents	162:21	rid
41:14,19	102:25	163:23	64:20
52:23 74:4	responding	164:10,19	ride
75:13,20	35:23 174:12	retraction	85:1
76:3 77:25	178:9	3:21 160:25	rifle
102:21,22		161:9,12	29:18,21,24

30:3	194:20	roles	safer
right	195:18	153:3	148:6
5:13 7:8,12,	199:19	Roman	safety
15 8:3,7,17	203:13	179:11	22:15 44:23
9:24 11:3	204:10	romance	45:2,20
12:21 13:10	205:6,13	153:3,21	saga
15:23 18:2,9	208:18 212:3	romantic	21:11
21:5 22:23	220:9,14	87:1	sake
23:5 26:6	right-hand	Rome	181:18
33:13,17	151:15	84:14	salary
34:3 39:3,	right-wing	Ronald	171:25
17,18 44:5	39:21	81:12	same-sex
45:17,23	rights	room	153:17
47:4,8	32:1,12	6:12 9:3	sample
57:17,25	57:10 81:6,	ropes	102:16
58:16,21	11 82:21	131:9	125:25
62:6 63:22	83:1,3,8	Ross	sampling
64:17 65:10	91:6 94:9	2:9 47:9	27:23
71:3 75:12	168:24	163:15	Samuel
78:4 79:20	Rind	164:10 165:1	163:15
84:4,25	70:10,11	180:10	San
91:22 93:21	132:15	188:13	81:2 122:18
95:7 96:19,	133:3,11,14,	row	Sarah
21 102:13	24 134:4,8	13:13	1:5 2:8,15
104:18	177:11	Rpringle@w-g.	16:18,25
110:16	Rind's	com	17:21 18:10,
116:10	133:12	2:12	23 30:18
121:12,23	rise	rules	32:24 40:4,
123:3 132:23	5:21 85:1	1:22 170:5,6	15 43:4 44:6
135:5 145:14	risk	rumors	46:9,14
149:11	122:11	3:23 170:23,	162:11
151:5,16	176:19 185:5	25 171:23	166:25
153:25	208:2	run	satanic
154:3,9	risks	199:9	80:11
156:13,17	124:21,23	running	satisfactory
157:6 158:9	risky	52:13,20	161:11 166:8
159:15	148:14,19	Rutledge	satisfied
160:9,24	rite	178:2	181:9
161:18 162:9	151:4		Save
164:8 165:14	rites		81:5
166:12	150:13,24	S	saved
168:11,19	151:6		137:24
171:21 176:5	ritualized	sad	Savin-
180:1 181:21	80:11	138:21	williams
182:14	role	139:7,19	101:9
183:6,21	70:4 120:24	140:12 141:7	102:15,21
186:17,18		safe	
189:2,5,24		117:19 203:2	
191:23			

Savin-	scholarly	screw	206:11
williams'	67:15 85:5	125:5	215:13,18
132:24	96:18 158:14	script	seek
say-so	190:16 191:9	154:21	60:10
131:20	202:17	scripted	seeking
saying	scholars	153:3	70:4 95:23
12:2 17:6	115:22	second	sees
22:12 52:5	120:14 124:8	36:15 65:11,	106:3
77:11,14	128:16	18,21 87:21	seldom
87:10 91:11	176:16	96:23,24	130:16
95:1,7	scholarship	100:14 150:6	self-
105:11,24	30:17 37:17	164:15	accepting
109:25	40:10,11	178:25	67:20
110:19 116:6	44:16 77:21	210:16	self-
118:10,12	78:19 99:2	section	assertion
119:18	116:22	111:8 112:22	157:4
121:1,12	169:18,21,	212:23	self-
145:13,23	22,23,24	216:20	confident
153:12	173:10	seduce	154:12
168:18 170:4	175:14 179:1	96:1	self-control
194:12	184:4,6	see	158:8,9
205:24	190:15	22:16 25:16,	self-
says	193:24	20,23 29:7	realization
17:25 25:12	218:19,23	30:5 36:18	158:6,8
41:1,19	219:22	38:14 42:1	self-
47:14 62:18	school	44:5 46:9	righteous
63:21,23,24	27:16 64:8	64:1 65:3	138:22
70:25 77:1	68:10 98:20	72:20 77:24	sell
78:7 79:24	122:18	87:17 89:18	93:25
99:9 103:24	123:24	96:7 103:24	selling
104:9 105:8	124:12	106:6 114:24	199:9
126:21,22	125:19	122:3,9	semester
127:13	135:17	131:25	14:25
143:12,14	138:10 164:4	133:14	209:23,25
151:18 153:1	science	140:17	212:21
176:15	81:17 84:12	144:23	seminar
178:14,15,20	85:22 92:9	145:4,5	176:11 200:5
182:8	sciences	147:11,17,25	Senator
188:15,23	84:3 134:22	156:13	81:8
189:6 209:22	scientific	165:25 170:6	send
212:10 213:5	84:6 144:7	173:3,5	165:8
214:6 215:11	scientist	175:22 176:7	sending
scandals	84:1	177:6 188:21	50:17
80:9	scientists	190:23	senior
Scant	27:20 182:2	191:14	171:11,13,20
122:20	scoutmasters	192:22	sensation
scholar	190:7	197:15	38:20
194:8 202:17		205:8,17	

sensational	seriously	17,18,20,22	82:8 85:6,18
80:24	28:10 32:24	124:9,12,15,	87:10 95:23
sensationalis	176:23	20,22,25	96:11 100:16
t	serve	125:2,11,20	101:3,6
80:11	208:4	126:7	102:8,10,18
sensations	service	127:11,12,	103:1,2
90:11	61:12	15,16 128:11	104:2 105:25
sense	set	129:18	107:2,3
32:9,19,20	135:8 136:1,	130:9,16	108:9 109:1
86:1 141:17	18	131:8,23	111:19
179:21	settled	132:6 136:11	116:12,25
209:13	166:7	138:7 141:24	119:6,19,23
senses	seven	142:4 144:2	121:3 122:13
38:15,25	96:8,9	146:8,25	125:8,12
41:3	122:6,8	148:4,13,20	126:6 127:9,
sensor	197:12	149:3,4,8,	23 129:12
51:16	218:11	15,22,23,25	132:18
sentence	severe	150:17,20	135:11
67:3 88:25	60:18 183:1	151:4,7,25	136:8,20
103:24,25	severely	157:20	139:21
106:11 108:6	53:17 85:17	165:18	140:18
112:16 122:3	sewer	178:14	142:12,14,
127:12	22:19	181:25	16,17,18,23
129:20,24	sex	182:2,10	144:2,8,15
130:22	4:10 13:2	189:22	148:6 152:8
137:9,11	27:2,5,6,8,9	191:1,14	154:15
146:7 153:1	47:1,5 54:6	192:3,10,11,	157:3,19,22
190:6 207:4	61:3 65:24	17 193:3,12,	158:5 159:16
209:19	69:5,14	15 194:9,11,	182:19
214:21	71:20,21	13,20 216:12	189:7,10
215:15	72:9,25	217:8,17	216:2,21
sentences	75:5,6,9,13,	sexes	217:3 218:5,
51:6	23 84:11	100:19	24
separate	86:9 87:1	sexological	sexuality
26:16 62:25	90:20 91:19	27:21	3:19 15:3
73:19 107:1	92:5 95:16	sexology	82:22 83:23
120:8 199:7	99:23 100:9	183:12	115:2,15
separated	104:4,11	sexual	122:11 124:6
90:9	105:4,9,10	3:16 14:19	139:16
sequence	109:19	15:21,23,25	168:25 209:2
13:23	111:14 113:7	27:9,17,24,	sexually
series	114:8 115:6,	25 43:1	55:5 73:7
3:11,12,24	15 117:15,	53:6,10,11	86:3 118:6
4:12 35:12	17,19,20,24	57:2 58:5,6	123:7 138:9
165:14 178:2	118:6	70:16 71:6	193:3,8
serious	121:13,18	72:4,11	shame
56:3 153:4	122:2,10,16	73:13 75:1	85:20
	123:3,11,14,	81:18,20	

shameful 116:16	shown 130:5,12	172:5,7,15	significant 100:11
share 53:6	136:10 138:4	173:12	significantly 132:19
Sherrard 26:7	shows 92:5,9 94:7	175:24 176:2	silent 102:16
shh 45:4	99:25 111:9	184:1,13,19	silly 138:10
shocked 9:23	112:25	185:2,9,15,	similar 115:1
shockingly 27:17	113:24 119:5	19 186:2	similarly 49:15 90:22
Shockley 23:7 24:15	130:15,21	187:8,16,20	simple 54:9 137:1
31:18	218:6	188:5 189:12	139:16
shoddy 179:1	Sibley 2:4 11:10,	190:19	simpleminded 36:25
shoot 34:24	20,24 12:3	191:5,7,10	simply 50:18 64:16
shooting 33:3,6,13,22	15:14,17	193:6 194:6,	104:7 157:16
34:5	17:2,4	21,25 195:21	208:2,12
shortage 220:4	18:12,25	196:8 199:14	sinuated 185:25
shorter 164:11	19:9,19,24	200:15	sir 20:6 28:17
Shorthand 1:21	20:3,7,9,14,	201:5,7,25	46:25 48:25
shot 33:25	19 23:14,17	202:19 203:3	62:8 77:11
should've 147:14,16	28:21,25	204:13	78:5 159:23
154:2	30:1,21	207:1,11	195:18
show 67:6 69:25	31:3,9 33:15	214:10,18	220:24
78:21 100:8	34:2 35:1	216:14	sit 9:15 129:5
106:17	37:6,9,21	217:19	201:17
126:21 131:9	38:6,13,18,	218:10,13,25	212:25
140:10	24 40:2,22	220:12,14,	site 163:20
142:19 217:5	41:11 42:25	19,21,25	sites 107:12
219:8	43:8 44:11,	Sibley@	sitting 13:12
showed 101:10	21 46:17	camarasibley.	situation 28:7 37:13
198:21	47:9 48:16,	com	72:15 113:11
showing 82:5	21 49:5,7,	2:7	114:19 127:8
	21,25 50:3,	sic	149:10
	15,25 51:12	160:5 195:23	Sixty 75:12
	55:22 58:4	196:1 220:17	
	61:16,20	sick	
	62:3 64:6,12	94:22	
	78:2 86:10	sickos	
	106:16	94:16 95:2,9	
	107:16	side	
	113:10 118:9	39:21 77:18	
	119:12 120:7	121:24	
	123:19 139:9	151:15 215:5	
	141:10	sign	
	147:3,8	220:20	
	152:2 155:18	signature	
	156:5 161:20	3:5 195:12	
	162:1 163:1	220:18	
	164:9,25	signed	
		195:8,14	
		212:5,6	

size	188:15,16,24	sort	specifically
125:25	205:5	35:22 46:10	21:23 71:22
skill	socially	55:19 75:18	72:2 74:21
117:12	87:25 98:4	125:9 134:8	101:2,7
120:19	societies	184:25 216:2	102:10 103:8
skills	89:4 108:23	217:7	129:12
127:13,22	110:18 112:9	sought	150:22
130:23	113:23 114:1	31:21	179:23 183:8
150:15	society	sounding	188:10
157:3,19	54:8 67:21,	204:23	194:12
skinny	23 80:3	sounds	speculate
138:10	81:16 84:19,	100:3 159:3	46:9
slave	20 91:1,15,	source	speculation
87:9	19 104:23	151:18	43:7 56:17
slaves	105:1 108:12	152:15	speech
67:12,18	109:13,21,24	169:11	27:10,12
Slovacek	110:3,7,8	176:14	28:20 29:3
2:9	111:7,11	sourcebook	speeches
slowed	112:3,4,12,	104:6 110:21	196:3,5
47:25	13,14 113:16	sources	spelled
small	114:11,16,	176:4,8	6:13
80:13 171:16	20,21 115:18	South	spent
190:2 196:13	116:20	69:17 115:9	10:11 49:1
212:8	137:16	sovereign	56:14
smear	146:21 149:2	163:11	spoke
30:12	158:5,11,18	sow	56:2,6 65:16
smugly	160:23	43:12	spoken
68:3,6	184:24 185:5	Spacey	134:4
social	187:24 188:4	98:13	Sportula
3:13,23	189:15	speak	163:21
17:17 19:13	219:1,6,10,	20:1,4,6	165:8,11
22:13,17,18,	11	57:4 203:13	spread
21,24 27:16,	sociological	SPEAKER	170:24
20 34:17	84:9	23:25 205:10	spreading
35:4 39:17	Socrate	speaking	171:1
42:16 51:17	86:16	10:23 56:8	squeamishness
81:17 84:1,	Socrates	146:3 180:7	92:19 93:6,
3,6,11,12	86:14,17,21	special	19
85:22 92:9	87:10,17	3:18 81:24	stable
97:25 98:7	88:2,3,4	128:3 134:21	30:15
107:25	sold	188:12	stage
116:21 117:6	93:13,24	specializes	130:8,16,17
120:22	solution	165:18	stand
121:2,11	121:18,20,21	179:11	66:24 136:21
148:3 157:3,	someone's	specific	143:24 189:6
19 168:16	219:14	31:12 76:3	218:15
182:2	sophisticated	84:10 187:21	
	108:3,14		

start 10:2 187:9	statistical 142:22	straight- oriented 70:15	studied 110:20
started 10:5 197:7	statistically 100:11	strands 74:5	116:22
starting 68:20 93:9	statues 68:10,11	strange 134:16	142:12
starts 107:21 182:5	status 17:1 218:16	204:22	182:11,21,22
state 1:22,23 44:7	statute 216:19,21	strategist 39:11 41:6,	studies 70:5,13,14,
54:22 61:5	statutory 216:7,9	21	16 71:4,5,7
122:25 144:4	217:2	strategy 82:20	103:11,17
stated 1:24 21:19	STDS 150:9	Street 2:5	130:5,12
37:2 112:2	steadily 154:24	strong 86:2 164:12	134:9,13
statement 8:6 11:12	steady 82:6	stronger 130:6,18	136:10 138:4
12:5 14:4	steering 65:2,5	148:4	142:8,10,19
34:23 35:23	stenographic 5:6	strongly 26:4 60:13	156:18
42:13 43:4,	stenotype 1:22	82:19 85:10	210:11,12,
13 46:4,19	step 86:19,22	146:19	13,18
59:16,21,22	87:18,20,21,	struck 44:6	study 27:15 28:8,
60:5 91:5	23 88:5	student 9:20 12:16	12 37:15
94:23 166:10	stigmatizatio n 114:13	13 21:22	49:22 50:13
168:3 174:12	stigmatized 113:21	41:20 44:15	70:8,10,12
179:24	sting 60:21	163:18 210:8	71:15,17
182:23	stop 108:24	student's 36:4	101:5 102:2
203:10 204:5	155:6,9	students 8:11 10:7	133:7
206:2,8,11,	stopping 47:10 61:17	14:8,14,19,	177:11,16
15,22 214:25	stories 14:22 49:2	24 15:2,4,7,	182:5
215:2,7,8,20	50:8	10 24:19	studying 103:8
statements 13:24 17:5,	story 16:12 85:16	31:7 36:7	stupid 117:5
10 34:19		64:15 100:6	166:15,16
43:10 162:20		124:4 174:13	167:2,6,16
163:23		176:13	168:3
164:7,11		186:10,11,16	stupidity 168:10
173:25		212:2,8,11	subaltern 67:18
174:25 184:8		students' 44:22 45:20	subject 10:9 14:23
194:2 215:9			15:12
218:4			subjected 134:19,20
states 1:1 63:19			subjective 44:13
69:20 138:19			subjectively 215:12
139:12			subjects
146:21 147:4			
Stating 11:11			

123:3 192:11	175:23	sure	symposia
subliminal	suggested	23:2,16	98:6
151:19	48:3	45:12 57:11	Symposium
152:16	suggesting	60:9 93:23	77:10 86:16
submit	47:18 109:22	95:10 99:10	87:13 88:10
178:2	127:15,21	170:11	syndrome
submitted	suggests	198:20 201:2	134:14
170:5 179:2	41:8 42:11	202:9,14	system
189:21 210:3	86:21 215:16	203:5 205:9	57:12 64:9
subpoena	suicide	214:12	94:13 114:24
40:11 179:3	85:2,13	Surgeon	124:12
210:4	115:11,12	124:17	systematic
subscribe	137:25	surprise	82:20
197:6	suing	79:24 174:16	systems
subscribed	181:18	surprised	123:24
196:21	suit	175:11	
197:12	176:17	surprising	<hr/>
subscribing	Suite	19:5	T
197:9	1:19 2:5,10	surrogate	<hr/>
subsequently	5:8	97:16	tacit
85:4 181:8	Sunday	survey	92:20 93:7,
subset	39:9 41:23	74:14,16,17	23
183:17 184:4	super	76:16 102:24	Taiwan
199:3	168:21	surveys	115:9
subsidiary	superior	50:17,19	take
62:24	68:18,22	73:19 74:24	22:20 33:2
suburb	87:19	75:6,22	47:10,15,19
122:18	supervision	100:1,5,6,8	51:11,19
successful	82:11	survivor	92:16 132:3
109:13,21	supervisory	56:14	212:12
suddenly	72:6,17	suspicious	214:8,11
178:17	support	152:10,13	taken
sue	2:16 5:7	susta	1:20 36:17,
8:1 163:25	47:16 52:3	90:25	22 37:4 48:4
174:3 181:9,	54:23 55:4,	sustained	91:21 208:23
17,18 211:12	20 63:13,22,	132:21	takes
212:10	24 69:12,13	swear	104:4
sued	83:12 214:14	40:19	taking
164:7	supports	sworn	51:13,15
suffered	63:14	1:20 5:11	talented
172:3	supposed	199:5	98:2
sufficient	14:3 86:2	symol	talk
162:7	supposedly	115:2	24:22,23
suggest	80:3	sympathetic	30:16,19
47:19 109:14	suppressing	137:23	44:17 53:9,
126:20 140:7	135:10	204:12	15 77:15,20
142:8 149:13	136:19		86:13 91:10
			96:19 98:17

120:16 122:2	tamp	184:9 215:24	tend
129:19,25	24:17	teenage	18:22 46:24
130:1 132:15	tangled	94:16,20	73:12 103:18
133:20	180:5	95:5,8,11,	121:16
146:16 159:6	targeting	12,19 109:3,	130:20
181:21	22:14	4 111:9	136:11,12
192:24 205:6	TAS	112:23	187:14
talked	10:2,15	143:21	tendency
9:4 34:11	21:15,17	147:18	207:21
73:5,6 74:3	taught	148:5,13,16	tense
112:5 125:24	176:11	149:3 150:7,	108:6
146:18 196:2	186:3,4,6,9	9,10 188:9	term
209:24	205:19	teenagers	13:4 32:19
213:23	206:3,10	55:6 126:4	38:19 71:2
talking	210:22 212:7	131:4,10	161:9 179:21
5:16 32:20	216:25	143:20	183:14,16,24
40:24 43:21	teach	149:18 188:9	184:6
47:21 72:1	14:20 15:25	teens	termed
73:17 77:5	21:9 122:23	118:23	82:1
79:11 81:18	186:10	151:12 220:6	terms
84:11 85:9	209:25	Telephone	13:4 15:20
89:11 93:16,	210:6,10	2:6,11	17:6 22:23
19 96:21	teacher	tell	70:22 75:7,
100:15	64:8 81:10	12:13 13:10	18 80:1
102:10	122:23	16:11 25:22	100:11 103:8
104:14,25	teachers	49:2 62:7	114:17
105:22	190:8	64:19 98:21	142:23
106:11 107:1	teaches	105:13	148:15 178:1
120:1 127:11	186:15,16	108:21	183:11 216:9
129:10,12,13	teaching	116:24 117:6	terrible
130:2,23	6:4 8:10	137:22	178:9
151:11	87:22 124:13	192:20	test
155:6,9	197:7 204:14	217:13	157:2,9,16,
157:9	213:20	telling	18 199:4
166:18,23,25	technical	74:8 94:19	testified
168:25 169:1	179:21	116:9 193:14	5:11 139:6
175:5 180:14	183:11	tells	testimony
184:22 201:8	technique	38:16 98:22	73:4 144:7
203:24	27:23 117:22	111:3	199:5
213:20	techniques	tempt	testosterone
217:22	118:5 124:4,	190:18	119:22
talkings	13,15,16	temptation	Texas
138:1	technology	190:11 191:4	1:1,19,22
talks	150:8	ten	2:5,10 5:6,8
125:4 176:9,	teen	28:4 162:13,	26:15 33:6,
11,25 216:11	144:17	14 197:13	23 34:24
tall	146:8,25	218:11	39:22 81:1
140:25			

205:20	100:10 118:5	141:7,15,19	10 173:24
206:4,10,17,	120:17	143:8,13	205:17
25 208:11	124:16	146:12	206:2,8,15,
216:3,13	142:24	148:13	23
text	155:13,14,16	149:19,24	thorough
25:21 99:9,	158:7 167:23	151:23	157:20
13 104:7	173:13	152:9,19	thoroughly
110:22 146:6	197:16	153:8 154:9	51:18 110:20
200:18,20	198:25 200:6	156:5,20,23,	134:16
216:25 217:6	214:17 220:8	25 157:13	thought
texts	think	158:1,25	13:13 14:2
106:10	8:14,15	159:14	16:22 53:14
Thailand	18:19 22:2,	161:2,3	108:18 117:1
61:2	11,18 23:8	167:2,4,6,	167:12 168:6
thank	25:15,20	11,13 168:3,	174:7 178:24
20:5 24:3	27:6 32:8,	18 176:20	180:25 207:3
37:11 140:4	16,23 34:16	180:5 181:1	thoughts
160:3 195:18	43:13 45:5,	185:20 186:5	16:23
them's	22,23 46:13,	188:1 189:9,	thousand
52:15 170:11	14 47:23	14 190:14,	71:15
therapy	50:4 54:21	16,24 191:9	thousand-odd
182:3	56:3,17	192:5,10	102:24
there'd	57:17 59:5	193:4 198:17	threatened
212:11	61:12 63:2,8	200:1,8	174:4
thighs	64:19 65:14	202:23	threaten
79:13	66:1,15,17	207:23	45:1 154:5
thin	67:15 69:2,	208:12	179:22
49:15	15,19 70:22	209:15	threatened
thing	71:24 78:20	210:21	153:10
7:17,18	82:1,9,15,25	211:5,21	three
12:11,17	83:14,16	212:3,12,17	25:12 36:14
24:16 35:2	91:11 92:2,	219:5 220:8	59:2 142:11,
51:4 54:8	17,23 93:9	thinking	13,21 145:19
60:14,15	94:8 95:10	70:23 126:12	147:23 164:7
100:13,14	98:10,15	194:16	183:11
104:4,12	99:20 101:6,	thinkings	208:23
111:7 123:9	10,18,22	39:24	throw
174:8 182:4	104:10,18,22	thinks	100:18
193:5	105:3,8	45:1 176:21	thrusters
things	108:7 116:11	186:17	78:19
10:3 12:4,8	118:17 120:2	third	till
16:4 33:5	121:19	87:22 112:21	10:1 140:20
34:21 37:1	123:12	150:7 161:9	220:15
40:8 53:17	124:22	211:16	time
55:1 73:10	125:5,11,14	Thomas	6:4,19 10:9
80:9 87:25	126:3 127:24	1:3,12,18	14:1 20:4
88:2 90:21	131:7,22	2:3 3:4,14,	21:17 23:2
	136:5,7	22 4:3 5:9,	
	139:5,15,20		

34:16 36:17,	114:11,14	tourism	true
19,23 37:4	129:5 139:17	61:3	13:20 48:14
49:1 53:12,	147:4 201:17	touting	56:24 67:14
13 56:5,20	220:9	39:20 111:18	70:2 93:15
60:11 62:23	today's	206:2,5,9,	94:4 95:5
65:14,16	110:11	16,23	99:15
66:11,18	146:21	tower	100:22,25
80:8 93:10,	189:15	33:6,13,14	101:1 107:15
18,22 96:18	219:10	town	108:5
125:23	told	80:13	114:20,21
139:15	7:21 11:5	traced	131:18
143:20 155:8	12:13 19:15	117:4	135:16
156:12	24:15 31:25	tradition	144:3,18
167:12	34:15,17	88:16	151:7,18
173:15 174:3	39:14 56:21	traditional	154:19
175:5,6,9	66:4 106:24	84:22 150:13	170:24
181:4,12	128:22,23	training	171:17
197:5 199:19	148:20,23	176:13	177:22
200:24	156:24	transcended	178:18
206:17,24	170:21	68:3	184:4,5
210:15,16	171:23	transcript	194:17
212:7 215:7	179:18,23	220:24	195:15
218:10	198:24 200:3	transformed	201:17
220:9,15	201:22	67:11	204:4,7
timed	204:25	transmitted	205:21
138:1	tolerant	122:13 123:7	207:23
times	115:14	transsexual	208:16
57:23 58:20	top	119:5	215:5,8,12
59:1,2 92:10	70:9 115:1	traumatic	218:24
97:21 139:8	134:18	116:15	truism
timidity	141:22	123:12 212:1	131:19
92:20 93:7,	143:16	treated	trust
20	188:18,23	207:20	19:21 22:22
title	215:5	treating	125:15
59:11	topic	152:22	143:8,10,14
188:11,12,20	178:14 212:1	treatise	trusted
189:3 209:6	total	104:1,2	126:15,23
titled	48:24	treatment	127:19,23
97:3	totality	119:23 182:3	128:9,12
today	37:1,16 40:9	treats	129:7 192:8
9:15 68:19	touch	94:14 158:5,	truth
93:13,25	24:20 38:15	11,18	74:8 194:2
98:9 99:15,	205:5	trial	trying
20 100:22,25	touched	220:15	50:22 60:19
106:23	29:20 32:13	trouble	64:20 83:2
108:5,7	tough	140:25	87:13 96:1
109:6 111:7	8:13		154:21
112:1 113:14			

turn	72:24 76:25	understand	university
43:19	77:23 79:21,	35:6 36:17,	22:7,9 24:16
turning	23 89:18	23 50:7 52:8	26:15 27:25
113:1	91:13 95:3	53:7 152:20	28:5 31:17
twice	102:4,7	185:21,23	33:3,6,23
59:5 191:17	103:22 122:1	194:9	34:24 50:23
Twitter	123:25	understanding	51:10 80:17
165:9	132:16	55:7 59:25	156:19 166:7
two	135:4,6	60:4 64:14	167:19,24
7:6 9:20	151:17	99:11 111:14	170:18 172:1
10:15 15:8	156:16 157:5	143:15	173:21 195:5
23:17 52:13,	170:10	160:22 198:5	200:5 205:20
23 55:2,9,11	213:14 218:1	199:5 203:18	206:4,10,17,
57:16,19	ultimately	understood	25 208:11
65:8,11	31:5 35:16,	11:2 197:16	211:25
78:11,16	22 164:1	Underwood	university's
79:17 96:16	166:7 210:5	35:18 198:9	36:1
100:10,19	212:3,18	204:15	Unknown
134:12 149:8	un	unexperienced	3:20
170:9 179:19	92:6 204:18	131:15	unlawful
196:3 197:22	unaware	unfair	146:24
199:7,17	204:8	181:14	unnatural
200:14	uncertain	unfavorable	88:19
type	46:7	47:20	unnecessary
178:7	uncomfortable	unhappy	88:18 135:9
typically	125:10,23	8:11	136:2,19
122:22	uncommon	unhelpful	unplanned
	98:16	28:6	122:12 123:3
U	underage	UNIDENTIFIED	unpleasant
	16:2 17:14	23:25 205:10	100:12
U.K.	32:10 55:5,8	uniformly	101:19 213:4
138:19	56:19 57:3	103:20	unproblematic
U.S.	70:24 76:4	uninformed	92:7 134:23
2:16 3:15	95:17 96:1	139:8	Unprotected
5:7 60:23	103:3,10	unit	123:20
61:5 63:23	132:18	47:25	unreasonable
115:16	135:8,9	United	138:8
122:3,10	136:2,18,19	1:1 63:19	unreliable
123:1 171:17	149:14	69:20 138:18	176:14
Uh	207:7,10,16,	146:21 147:4	unstable
23:21 26:18	21 214:17	universalizin	30:7,10
uh-huh	216:3,22	g	33:11
5:15,19 8:19	undergraduate	111:13	unthreatening
21:8 23:13	163:18 212:9	universally	83:17
24:24 26:8	undergraduate	148:17	untrue
29:8,11	s	universities	11:15 56:25
39:13 43:18	30:20,22	171:20	94:8 213:4

untruths	138:5 187:4	village	vulnerable
11:12	189:15	132:12	135:8 136:17
unusual	veins	violate	
99:20	73:20	95:14	
unusually	verbal	violated	W
8:13	42:14 179:6	56:21 86:3	Wage
unwilling	verify	violating	151:15
30:19,20,23	34:22 74:12	60:13	wait
unwittingly	204:25	violation	140:20
89:14,20	version	60:16 86:6,	220:23
upper-class	85:11 198:25	7,8 139:23	waiting
97:8	Verstraete	207:18	61:16 128:14
upset	4:6 178:8,16	violence	wakes
14:1,8,13	versus	48:2 211:15	100:24
upsetting	63:19 64:3,	216:1,4,13,	walk
22:5	11	16,18,20	8:8 13:17
Uranian	viability	217:2,4,9,	Wallace
77:9	193:24 194:2	12,14,18,21	62:19,22
Uranians	vice	violent	66:4,7,13,19
77:8	23:9	184:9 201:9	76:18 199:3,
urges	victim	215:24	6,8,12
135:11	85:21	216:8,10,11	wanna
136:20	victims	virtually	20:12
140:18	85:20,22,24	49:9 114:4	want
UT	190:17	124:3	10:8 20:23
27:18 28:2	videographer	virtue	23:19 34:6
209:23	2:16 5:1	61:11	67:3 78:25
	20:22 61:21,	visited	83:14 91:10
v	24 160:4,7	59:6	96:4 109:5,
	180:3,8,10	voices	10 118:13
Vader	195:22,25	70:21 211:15	119:6 129:25
42:11 166:19	218:11	Voilà	136:25
valgolarize	220:16	24:3	137:6,14
14:22	VIDEOTAPED	volume	155:6,10,12,
valid	1:11,18	1:14 63:4,14	13 160:9
190:25	view	190:1 191:12	181:17,18
values	40:12,15	192:1,6	185:4 210:22
18:22	89:11,12	194:7	220:22,24
vanilla	197:15	volunteering	wanted
83:17	viewed	155:15	51:9 53:6
varieties	219:2,4	volution	54:3 59:25
120:9	views	111:10	64:14 105:15
various	198:1	Voss	137:19,20
167:22	215:17,19	79:9	162:20
vast	VIII	VP	188:25
75:10,23	188:21	163:9	197:14,15
			198:4

wanting	60:20	215:4,13	women's
53:16 173:24	Weekly	Wilde	200:3 210:18
175:22 177:5	133:22	77:8	Womens
185:3	weeks	Willard	210:12
war	35:25 56:7,9	198:8	wonder
97:21 139:3	200:14	204:16,20	98:14
220:4	Welch	William	word
warn	137:19,21	165:23	11:17,21
60:11 207:18	welcomed	willingly	48:17,19
warned	84:21 94:24	73:22	49:8 71:3
26:4 60:13	well-balanced	wing	92:23
warning	30:14	42:16 187:2	144:12,25
61:13 194:13	well-to-do	wisdom	145:1,15
warnings	122:18	117:9	148:1 152:3
60:18,19	went	wiser	166:21
way	9:2,24	154:9	183:23
13:16 14:21	21:15,25	witch	184:14,17
17:23 18:10	66:1 98:12	80:18	185:21,23
29:15 30:13	143:12	withdraw	190:20
46:23 47:14	197:10	107:18 163:7	205:22
49:9 50:6	western	179:24	214:9,11
58:14 69:7	1:1 108:23	withdrawn	216:20
70:23 74:1	112:9 113:23	175:4	217:1,3,4
81:23 112:10	114:4 184:24	withdrew	wording
116:9 158:4,	Westheimer	161:10	46:18 51:2
11,17 166:8	2:10	withhold	words
168:9,11,19	WGS	111:11	7:24 12:9
173:18	210:11 211:2	witness	78:11,13
185:20,22	212:11	1:19 9:17	90:19 96:23,
192:22	whatsoever	20:25 21:4	24 111:10
194:14,15,22	18:10	180:12,15,17	147:13,23
200:12	whiff	220:12	208:23
202:20	125:2,21	woman	work
216:23	126:8	7:2 9:11	12:15 14:4
ways	White	16:12 137:14	27:16 36:25
72:8 163:21	31:2,4	151:20	37:16,20
194:18	widely	201:24	38:23 48:7,
wealth	14:18	women	11 58:5
67:25	wider	7:6 16:11	74:17 84:2
web	158:6	67:12,17,24	89:7 91:12
205:1	widespread	70:3 78:10	132:24 136:7
website	17:14 46:23	103:2 138:3	158:15,19
39:15 51:6	wife	141:25 148:7	178:23 199:8
52:7,12,14,	78:6	149:5 150:11	219:22,24
20 56:10	Wikipedia	151:12 159:7	workers
165:6,8	51:19 203:9,	164:7	116:21 117:6
websites	18,25 204:7	210:11,13	working
			53:7 182:2

workloads	211:12	77:19 88:9	109:2 112:17
8:13,15	writings	93:17 99:16	115:15
works	4:10 39:24	109:11	117:14
87:22 209:1	50:2,4,13	116:19	122:12
world	79:2 174:14	117:23 122:8	123:10
106:13 108:1	176:21	131:6 132:5	127:21
110:11	181:25	146:16	129:17 132:5
111:24	189:21 202:6	148:23 152:7	137:10 144:1
115:2,7,8	written	162:1 171:8	150:6 151:11
150:14	15:4 96:16	180:5,17	184:12
154:12	158:19	188:23 189:1	208:20
206:19	161:15	195:21	209:12,16
world's	178:12	205:13	younger
213:8 214:7,	wrong	213:6,12	78:18 86:9
23	32:24 87:15	214:3 218:13	97:20 104:20
worried	186:23	220:13	107:12
14:24 15:1	192:16	year	109:16
36:8 149:22	213:15	58:20 96:16	111:21 130:7
151:23	wrote	114:10	youngster
worse	32:21 85:4	117:15,25	105:13
154:24,25	96:15 156:7,	133:17 144:2	youth
worth	10 170:13	157:15,16	34:1 82:22
158:2 181:15	178:10,12	163:5	83:23,24
would've	179:2,14,17	years	106:7,8
44:15 59:23	194:12	8:10 14:7	107:4,13
96:16 133:9	198:13	52:21 55:15,	108:8
137:25		23 57:6,16,	youthful
171:12,24	X	20 58:1,15	106:1
174:17		59:19,23	youths
175:12	Xenophon	64:18 65:22	97:9 131:8
202:3,13,21	87:12	72:21 116:4,	
Wright		5 117:18	Z
1:19	Y	121:10	
write		142:13	Zaramian
49:3 153:19	Yarrow	156:22	21:20 204:14
177:19,24	179:5,7	171:14 186:3	zeal
190:2	180:22 181:6	196:4 197:13	135:7 136:17
219:12,17,19	Yarrow's	York	zero
writes	4:9 180:21	64:8 66:3	18:24 22:24
204:15	181:2	165:17	65:20
writing	yeah	young	Zinn
44:20 67:16	12:22 15:25	7:2 18:21	80:6
80:6 104:5	19:22 20:14,	55:8 61:3	zoological
178:1	16,19 21:1,4	71:5 78:22	130:5
181:22,23	23:15 30:5	81:21 86:5	zoology
208:18	58:8 61:16	87:14 91:19	130:20
209:11	62:4 69:10	92:3 93:15	
		98:2,3 108:1	

Zoom

1:18